



**Wisconsin Department of
Children and Families**

**Wisconsin State Plan
For Administration of the
Community Services Block Grant
For Federal Fiscal Years 2022 and 2023**

Prepared by the
Bureau of Working Families
Division of Family and Economic Security
Wisconsin Department of Children and Families
201 West Washington Avenue
P.O. Box 8916
Madison, WI 53708-8916

SECTION 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

1.1. Identify whether this is a one-year or two-year plan. **Two Year**

1.1a. Provide the federal fiscal years this plan covers: **Year One FFY2022 Year Two FFY2023**

1.2. **Lead Agency:** Update the following information in relation to the lead agency designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.

Has information in regards to the state lead agency changed since the last submission of the state plan? **Yes**

If yes, provide the date of change and select the fields that have been updated:

- | | | |
|--|--|--|
| <input type="checkbox"/> Lead Agency | <input type="checkbox"/> Department Type | <input type="checkbox"/> Department Name |
| <input type="checkbox"/> Authorized Official | <input checked="" type="checkbox"/> Street Address | <input type="checkbox"/> City |
| <input type="checkbox"/> Zip Code | <input type="checkbox"/> Office Number | <input type="checkbox"/> Fax Number |
| <input type="checkbox"/> Email Address | <input type="checkbox"/> Website | |

1.2a. Lead agency **Wisconsin Department of Children and Families**

1.2b. Cabinet or administrative department of this lead agency **[Check One]**

- ☐ Community Services Department
- ☒ Human Services Department
- ☐ Social Services Department
- ☐ Governor's Office
- ☐ Community Affairs Department
- ☐ Other, describe: _____

1.2c. **Cabinet or Administrative Department Name:** Provide the name of the cabinet or administrative department of the CSBG authorized official

Secretary's Office

1.2d. Authorized official of the lead agency. The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter (attached under item 1.3). The authorized official is the person indicated as authorized representative on the SF-424M.

Name Emilie Amundson Title Secretary

1.2e. Street Address **201 West Washington Avenue**

1.2f. City **Madison**

1.2g. State **WI**

1.2h. Zip **53708**

1.2i. Work Telephone Number and Extension 608-422-7000

1.2j. Fax Number 608-422-7163

1.2k. Email Address Emilie.Amundson@wisconsin.gov

1.2l. Lead Agency Website www.dcf.wisconsin.gov

1.3. Designation Letter: Attach the State's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed. **[Attach a document.]** See Attachment: 1.3 CSBG Designation Letter

1.4. CSBG Point of Contact: Please provide the following information in relation to the designated State CSBG Contact. The State CSBG point of contact should be the person that will be the main point of contact for CSBG within the State.

Has information regarding the state point of contact changed since the last submission of the state plan? Yes

If yes, provide the date of change and select the fields that have been updated

- | | | |
|--|---|--|
| <input type="checkbox"/> Agency Name | <input type="checkbox"/> Point of Contact | <input checked="" type="checkbox"/> Street Address |
| <input type="checkbox"/> City | <input type="checkbox"/> State | <input type="checkbox"/> Zip Code |
| <input type="checkbox"/> Office Number | <input type="checkbox"/> Fax Number | <input type="checkbox"/> Email Address |
| <input type="checkbox"/> Website | | |

1.4a. Agency Name Wisconsin Department of Children and Families

1.4b. Point of Contact Name

Name Anna Sainsbury

Title CSBG Contract Manager

1.4c. Street Address 201 West Washington Avenue

1.4d. City Madison

1.4e. State WI

1.4f. Zip 53703

1.4g. Office Telephone Number 608-422-6270

1.4h. Fax Number 608-261-6376

1.4i. Email Address anna.sainsbury@wisconsin.gov

1.4j. Agency Website www.dcf.wisconsin.gov

1.5 Provide the following information in relation to the State Community Action Association.

There is currently a state Community Action Association within the state. Yes

Has information in regards to the state Community Action Association changed since the last submission of the state plan? **No**

If yes, provide the date of change and select the fields that have been updated

- | | | |
|--|---|---|
| <input type="checkbox"/> Agency Name | <input type="checkbox"/> Point of Contact | <input type="checkbox"/> Street Address |
| <input type="checkbox"/> City | <input type="checkbox"/> State | <input type="checkbox"/> Zip Code |
| <input type="checkbox"/> Office Number | <input type="checkbox"/> Fax Number | <input type="checkbox"/> Email Address |
| <input type="checkbox"/> Website | | |

1.5a. Agency Name **Wisconsin Community Action Program Association (WISCAP)**

1.5b. Point of Contact Name

Name **Brad Paul**

Title **Executive Director**

1.5c. Street Address **30 W Mifflin St, Suite 406**

1.5d. City **Madison**

1.5e. State **WI**

1.5f. Zip **53703**

1.5g. Office Telephone Number **608-244-4422**

1.5h. Fax Number **608-244-4064**

1.5i. Email Address **bpaul@wiscap.org**

1.5j. Agency Website **www.wiscap.org**

1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead **No**

SECTION 2: State Legislation and Regulation

2.1. CSBG State Legislation Does the State have a statute authorizing CSBG? **Yes**

2.2. CSBG State Regulation Does the State have regulations for CSBG? **No**

2.3. If yes was selected in item 2.1 or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate. **[Attach a document and/or provide a link]**

<http://docs.legis.wisconsin.gov/statutes/statutes/49/III/265>

2.4. State Authority: Please select a response for each question about the State statute and/or regulations authorizing CSBG:

2.4a. Authorizing Legislation: State legislature enacted authorizing legislation or amendments to an existing authorizing statute last federal fiscal year. **No**

2.4b. Regulation Amendments: State established or amended regulations for CSBG last federal fiscal year. **No**

SECTION 3: State Plan Development and Statewide Goals

- 3.1. CSBG Lead Agency Mission and Responsibilities:** Briefly describe the mission and responsibilities of the State agency that serves as the CSBG lead agency. **[Narrative, 2500 characters]**

Wisconsin's Community Services Block Grant (CSBG) lead agency is the state's Department of Children and Families (DCF), which has the mission of promoting the economic and social well-being of Wisconsin's children and families. DCF is committed to protecting children and youth, strengthening families, and supporting communities.

DCF operates over 30 programs in the following categories:

- Child Protective Services
- Milwaukee Child Welfare
- Domestic violence response
- Child Support
- Child Care Regulation and Licensing
- Child Care Subsidy
- Refugee and Immigrant Integration
- Special Needs Adoption
- Foster Care
- Kinship Care
- Temporary Assistance for Needy Families (TANF)

DCF's Division of Family and Economic Security (DFES), Bureau of Working Families is responsible for administering CSBG funds. Along with CSBG, DFES administers the Temporary Assistance for Needy Families (TANF) cash assistance program, which is known as Wisconsin Works (W-2), Refugee Services, and the Child Support program. This provides for coordination of programming to help impoverished families, and assists in the Division's vision: *that every individual, child, and family is economically and socially secure.*

- 3.2. State Plan Goals:** Describe the State's CSBG-specific goals for State administration of CSBG under this State Plan. **[Narrative, 2500 characters]**

Instructional Note: For examples of "goals," see State Accountability Measure 1Sa(i).

Note: This information is associated with State Accountability Measure 1Sa(i) and pre-populates the State's Annual Report, Module 1, Item B.1.

1. DCF will identify and implement resources for eligible entities for the collection, analysis, and application of Community Needs Assessment data statewide. Per State Accountability Measure 1Sa(i), this goal will be realized through the following strategies:
 - a. Targeted Training and Technical Assistance (T/TA) by WISCAP through a contract with DCF;
 - b. Meetings with WISCAP to specifically discuss progress on this goal at least quarterly;

- c. Formation of a Community Needs Assessment work group; and
 - d. Analysis of 2022 Community Needs Assessment data.
- 2. DCF will increase employment opportunities for CSBG participants. Per State Accountability Measure 1Sa(i), this goal will be realized through the following strategies:
 - a. Collaborating with state workforce partners to participate in the WIOA Combined State Plan (participation pending);
 - b. Expansion of and targeted T/TA for the Skills Enhancement Program (SEP), a general purpose revenue-funded employment program specifically geared toward Wisconsin's eligible entities;
 - c. Employment-focused initiatives and communications on both the agency and community levels, including the dissemination of opportunities to eligible entities from other state agencies and key stakeholders; and
 - d. Comparison of CSBG Annual Report and SEP outcomes to measure results.
- 3. DCF will partner with eligible entities, other state agencies, and other trusted community partners to conduct vaccination hesitancy outreach and education. Per State Accountability Measure 1Sa(i), this goal will be realized through the following strategies:
 - a. Disseminating educational materials, funding opportunities, and community events to increase visibility and ensure a cohesive message on vaccines is being received by the public. DCF will support eligible entities in their administration of other funding sources, identify areas of collaboration with key stakeholders, and assist eligible entities in making any amendments to their Community Action Plans in order to accommodate these efforts and leverage CSBG funding;
 - b. Collaborating with other state agencies, including DOA, DHS, and DPI;
 - c. Streamlining communications and providing cross training with the Head Start network;
 - d. Providing targeted communications and resources; and
 - e. Disseminating CSBG agency-generated materials and events across the state using press releases, social media posts, and connections with other state agencies;
 - f. Offering up time and space during WISCAP conferences and during the WISCAP Wednesday virtual training platform;
 - g. Assisting with and/or participating in focus groups or community convenings on COVID-19 response and education efforts. Using information and data obtained to identify needs in these areas and assist eligible entities in connecting with appropriate resources on the state level; and
 - h. Administering CSBG funds with T/TA focused on these efforts through a contract with WISCAP.

3.3 State Plan Development: Indicate the information and input the State accessed to develop this State Plan.

3.3a. Analysis of state-level tools [Check all that applies and add narrative where applicable]

- ☒ State Performance Indicators and/or National Performance Indicators (NPIs)
- ☒ U.S. Census data
- ☒ State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)

- ☒ Monitoring Visits/Assessments
- ☐ Tools not identified above (specify) **[Click or tap to enter text]**

3.3b. Analysis of local-level tools [Check all that applies and add narrative where applicable]

- ☒ Eligible entity community needs assessments
- ☒ Eligible entity community action plans
- ☒ Public hearings/Workshops
- ☐ Tools not identified above (specify) **[Click or tap to enter text]**

3.3c. Consultation with [Check all that applies and add narrative where applicable]

- ☒ Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- ☒ State Association
- ☒ National Association for State Community Services Programs (NASCSPP)
- ☐ Community Action Partnership (The Partnership)
- ☐ Community Action Program Legal Services (CAPLAW)
- ☒ CSBG Tribal Training and Technical Assistance (T/TA) Provider
- ☐ Regional Performance Innovation Consortium (RPIC)
- ☐ Association for Nationally Certified ROMA Trainers (ANCRT)
- ☒ Federal CSBG Office
- ☒ Organizations not identified above (specify) **Department of Workforce Development; Department of Administration, Division of Energy, Housing, and Community Resources; Department of Health Services; Head Start Collaboration Office; Wisconsin Head Start Association.**

3.4 Eligible Entity Involvement

3.4a. Describe the specific steps the State took in developing the State Plan to involve the eligible entities.

Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the State's annual report form.

DCF involved the eligible entities in the development of this State Plan in the following ways:

- Eligible entities were briefed on the CSBG State Plan process and encouraged to ask questions and provide feedback at:
 - A CSBG Annual Report training hosted by DCF on February 10, 2021;
 - The WISCAP board of directors meeting on February 25, 2021; and
 - The WISCAP annual meeting on May 27, 2021. The CSBG contract manager also discussed the State Plan process and timeline with the eligible entities at both meetings.
- DCF held a video conference call for the eligible entities and WISCAP on August 4, 2021 to go over the draft State Plan, answer questions, and gather additional input. Staff members from 13 of the 18 eligible entities participated in this conference call.
- DCF sent out a survey on August 5 and August 13, 2021 to request additional input on a variety of the State Plan elements, including goals, monitoring, allocation methodology, and communication strategy.

- DCF shared an updated draft of the CSBG State Plan with the eligible entities on August 22, 2021.
- DCF presented the CSBG State Plan at the WISCAP quarterly board meeting on August 25, 2021.
- DCF ensured that all eligible entities received notice of the combined public and legislative hearing on the CSBG State Plan held on August 30, 2021, and encouraged eligible entities to post the notice and plan in their local communities and participate in the hearing.

3.4b. Performance Management Adjustment: How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order 1) to encourage eligible entity participation and 2) to ensure the State Plan reflects input from eligible entities? Any adjustment should be based on the State's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail.

Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and may pre-populate Annual Report, Module 1, Item B.1.

In addition to the increased opportunities for eligible entity discussion and feedback that DCF implemented with the FY20-21 CSBG State Plan, DCF added the opportunity to provide feedback via electronic survey using Survey Monkey. DCF made these changes based on feedback received in the 2019 and 2021 ACSI Survey of eligible entities.

3.5. Eligible Entity Overall Satisfaction: Provide the State's target for eligible entity Overall Satisfaction during the performance period.

Instructional Note: The state's target score will indicate improvement or maintenance of the States' Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the State's eligible entities.

Note: Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the State's annual report form.

Year One 89 **Year Two** 89

SECTION 4: CSBG Hearing Requirements

- 4.1. Public Inspection:** Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act.

DCF made the CSBG State Plan available for public inspection and comment by posting the plan on the department's website and including a link to the plan on all notices about the public hearing. DCF also posted a link to the plan and hearing notice on its social media accounts. DCF disseminated the plan to three other state agencies with request for review and comments prior to the public hearing. DCF requested each eligible entity post the draft plan at their service locations for public view and comment.

- 4.2. Public Notice/Hearing:** Describe how the State ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act.

DCF distributed notice about the hearing on August 13, 2021. This allowed 17 days for the public to comment in advance of the hearing date, an increase of 7 days from the previous State Plan hearing held in 2019. DCF used the following methods to distribute notice: (1) sending hearing notice to all eligible entities and WISCAP, for review and dissemination within their communities to stakeholders and key partners; (2) sending the hearing notice to legislative bodies and administrative offices for the State of Wisconsin; (3) sending the hearing notice to three other state agencies with key stakeholders; (4) posting the notice on DCF's website and social media accounts; (5) posting the hearing notice at the Wisconsin State Capitol building; and (5) sending the hearing notice to the Wisconsin State Journal, a statewide news medium obligated to give notice to persons affected in accordance with Wis. Stat. s. 19.84.

- 4.3 Public and Legislative Hearings:** In the table below, specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the Act.

Instructional Note: A public hearing is required for each new submission of the State Plan. The date(s) for the public hearing(s) must have occurred in the year prior to the first federal fiscal year covered by this plan. Legislative hearings are held at least every three years, and must have occurred within the last three years prior to the first federal fiscal year covered by this plan.

Date	Location	Type of Hearing
August 30, 2021	Wisconsin Department of Children and Families Via video and conference call hosted through Zoom due to health and safety requirements arising out	<input type="checkbox"/> Public <input type="checkbox"/> Legislative <input checked="" type="checkbox"/> Combined

	of the COVID-19 pandemic	
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4.4 Attach supporting documentation or a hyperlink for the public and legislative hearings.

<https://dcf.wisconsin.gov/csbg>

DRAFT

SECTION 5: CSBG Eligible Entities

5.1 CSBG Eligible Entities: In the table below, list each eligible entity in the State, and indicate public or private, the type(s) of entity, and the geographical area served by the entity. (This table should include every CSBG Eligible Entity to which the State plans to allocate 90 percent funds, as indicated in the table in item 7.2. Do not include entities that only receive remainder/discretionary funds from the State or tribes/tribal organizations that receive direct funding from OCS under Section 677 of the CSBG Act.)

CSBG Eligible Entity	Public or Nonprofit	Type of Agency (CAA, Limited Purpose Agency, Migrant or Seasonal Farmworker Organization, Tribe)	Geographical Area Served
ADVOCAP, Inc.	Nonprofit	CAA	Fond du Lac, Winnebago and Green Lake Counties
CAP Services, Inc.	Nonprofit	CAA	Marquette, Outagamie, Portage, Waupaca, and Waushara Counties
Central Wisconsin Community Action Council, Inc.	Nonprofit	CAA	Adams, Columbia, Dodge, Juneau, and Sauk Counties
Community Action Coalition for South Central Wisconsin, Inc.	Nonprofit	CAA	Dane, Jefferson, and Waukesha Counties
Community Action Inc. of Rock and Walworth Counties	Nonprofit	CAA	Rock and Walworth Counties
Couleecap, Inc.	Nonprofit	CAA	La Crosse, Monroe, Vernon, and Crawford Counties
Indianhead Community Action Agency, Incorporated	Nonprofit	CAA	Burnett, Clark, Rusk, Sawyer, Taylor, and Washburn Counties
Lakeshore CAP, Inc. of Wisconsin	Nonprofit	CAA	Door, Kewaunee, Manitowoc, and Sheboygan Counties
Newcap, Inc.	Nonprofit	CAA	Brown, Shawano, Oconto, Menominee, Langlade, Oneida, Vilas, Forest, Florence, and Marinette Counties

North Central Community Action Program, Inc.	Nonprofit	CAA	Marathon, Wood, and Lincoln Counties
Northwest Wisconsin Community Services Agency, Inc.	Nonprofit	CAA	Douglas, Bayfield, Ashland, Iron, and Price Counties
Racine/Kenosha Community Action Agency, Inc.	Nonprofit	CAA	Racine and Kenosha Counties
Community Relations- Social Development Commission	Nonprofit	CAA	Milwaukee County
Southwestern Wisconsin Community Action Program, Inc.	Nonprofit	CAA	Richland, Iowa, Grant, Lafayette, and Green Counties
West Central Community Action Agency, Inc.	Nonprofit	CAA	Chippewa, Dunn, Pepin, Pierce, St. Croix, Polk, and Barron Counties
Western Dairyland Economic Opportunity Council, Incorporated	Nonprofit	CAA	Trempealeau, Buffalo, Eau Claire, and Jackson Counties
Foundation for Rural Housing, Inc.	Nonprofit	Limited Purpose Agency	Statewide, with the exception of Dane, Milwaukee, and Racine Counties
United Migrant Opportunity Services/UMOS Inc.	Nonprofit	Migrant or Seasonal Farmworker Organization	Statewide

5.2 Total number of CSBG eligible entities: **18** [This will automatically update based on the chart above.]

5.3 Changes to Eligible Entities list: Has the list of eligible entities under item 5.1 changed since the State's last State Plan submission? ☐ Yes ☒ No

SECTION 6: Organizational Standards for Eligible Entities

Note: Reference IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*, for more information on Organizational Standards. Click [HERE](#) for IM 138.

- 6.1. Choice of Standards:** Check the box that applies. If using alternative standards, a) attach the complete list of alternative organizational standards, b) describe the reasons for using alternative standards, and c) describe how the standards are at least as rigorous as the COE-developed standards.

- ☒ Center of Excellence (COE) CSBG Organizational Standards
- ☐ Modified version of COE CSBG Organizational Standards
- ☐ Alternative set of organizational standards

- 6.2. Implementation:** Check the box that best describes how the state officially adopted organizational standards for eligible entities in the state in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary.

- ☐ Regulation
- ☒ Policy
- ☒ Contracts with eligible entities
- ☐ Other, describe: _____

- 6.3. Organizational Standards Assessment:** Describe how the state will assess eligible entities against organizational standard this federal fiscal year(s).

- ☐ Peer-to-peer review (with validation by the State or State-authorized third party)
- ☒ Self-assessment (with validation by the State or State-authorized third party)
- ☐ Self-assessment/peer review with State risk analysis
- ☐ State-authorized third party validation
- ☒ Regular, on-site CSBG monitoring
- ☒ Other

- 6.3a.** Describe the planned assessment process.

DCF will assess if each eligible entity is meeting the CSBG Organizational Standards through the on-site CSBG monitoring that it conducts at least once every three years. DCF will also conduct an annual desk review to assess each eligible entity against the Organizational Standards. This process requires eligible entities to first complete a self-assessment using DCF's CSBG Organizational Standards Desk Audit form and submit supporting documentation of compliance to DCF. DCF then reviews and validates each entity's

compliance, the results of which are communicated to WISCAP, the eligible entities, and to OCS via the CSBG Annual Report.

6.4. Eligible Entity Exemptions: Will the State make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? **Yes**

6.4a. Provide the specific eligible entities the state will exempt from meeting organizational standards, and provide a description and a justification for each exemption. Total number of Exempt Entities: **3 [Auto-calculated]**

CSBG Eligible Entity	Exemption Provided [Yes/No]	Description/Justification
Foundation for Rural Housing, Inc.	Yes	<p>DCF is exempting Foundation for Rural Housing, Inc. (FRH) from Organizational Standard 5.1, which requires a tripartite board of directors, and 5.2, which requires a democratic selection process for low-income board representatives.</p> <p>As a statewide limited purpose agency with an annual budget under \$500,000, the rationale for making an exception for FRH is that maintaining a tripartite board and putting a statewide democratic selection process in place would put an undue burden on FRH. Furthermore, the agency has historically ensured that at least 50% of its board members are representatives from low-income communities.</p>
United Migrant Opportunity Services/UMOS, Inc.	Yes	<p>DCF is exempting United Migrant Opportunity Services/UMOS, Inc. (UMOS) from Organizational Standard 5.1, which requires a tripartite board of directors, and 5.2, which requires a democratic selection process for low-income board representatives.</p> <p>As a multi-state agency that uses CSBG funding for specific services targeted to Wisconsin's migrant and seasonal farmworker families, the rationale for exempting UMOS from these standards is that maintaining a tripartite, multi-state board of directors is not appropriate for this organization, which operates services in Kansas, Missouri, Minnesota, and Texas as well as Wisconsin. In addition, unlike a community action agency, UMOS does not weave CSBG funds throughout its agency, but instead uses these funds in a single program focused on the state's farmworkers. UMOS does maintain a tripartite CSBG Advisory Committee</p>

		<p>that is selected by its board of directors and focuses on planning and oversight for the CSBG-funded farmworker program. This committee does not have a democratic selection process in place for its low-income representatives, and DCF does not require this as doing so would create limited benefits relative to the resources such a process would require.</p> <p>DCF is also exempting UMOS from the requirement stated in CSBG Organizational Standard 9.4 that the IS Survey (now Annual Report) reflects organization-wide outcomes. The rationale for this exemption is that for a limited purpose agency, UMOS only uses CSBG funds for a single program, and as a large organization with services in multiple states, it is unreasonable to require UMOS to report all of its outcomes on the IS Survey (now Annual Report).</p>
11 Wisconsin tribal organizations that receive discretionary CSBG funds	Yes	<p>Consistent with guidance provided by OCS Information Memorandum 138, DCF will not apply the CSBG Organizational Standards to the 11 Wisconsin tribal organizations that receive discretionary CSBG funds as part of the Family Services Program (FSP) funding that DCF contracts to the tribes.</p>

6.5. Performance Target: Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFY(s) of this planning period.

Note: This information is associated with State Accountability Measures 6Sa and may pre-populate the Annual Report, Module 1, Table D.2.

Year One 50%

Year Two 50%

SECTION 7: State Use of Funds

Eligible Entity Allocation (90 Percent Funds) [Section 675C(a) of the CSBG Act]

7.1 Formula: Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities. **[Select one]**

- ☒ Historic
- ☐ Base + Formula
- ☐ Formula Alone
- ☒ Formula with Variables
- ☐ Hold Harmless + Formula
- ☐ Other

7.1a. Formula Description: Describe the current practice for allocating CSBG funds to eligible entities.

The CSBG Act requires at least 90% of the CSBG funds be made available for grants for the purposes of CSBG, which is met through the allocations to the our state's 18 eligible entities: 16 Community Action Agencies (CAAs), plus Foundation for Rural Housing (FRH) and UMOS.

The amount allocated for each Community Action Agency (CAA) is based on the percent of low-income individuals in the geographic area served by the CAA. DCF uses "Poverty Estimate All Ages" data from the U.S. Census Bureau, Small Area Income and Poverty Estimates (SAIPE) Program to calculate the percent of low-income individuals in each geographic area served by the CAA, and updates its allocations decennially with the release of new census demographic data. The CAA receives the percentage of funding related to the percentage of low-income individuals covered by the CAA's service area. The total allocation to CAAs is 87.47%.

DCF allocates historic amounts of 4% of CSBG funds to UMOS, and 1.4% to FRH, based on a process established over twenty years ago. Combined with the CAA funding percentage, DCF passes through 92.87% of CSBG funding to eligible entities.

7.1b. Does a state statutory or regulatory authority specify the formula for allocating "not less than 90 percent" funds among eligible entities? **No**

7.2 Planned Allocation: Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and "not less than 90 percent funds" as described under Section 675C(a) of the CSBG Act. In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal years covered by this plan.

Planned CSBG 90 Percent Funds		
CSBG Eligible Entity	Year One Funding Amount	Year Two Funding Amount
ADVOCAP, Inc.	3.86%	3.86%
CAP Services, Inc.	4.52%	4.52%
Central Wisconsin Community Action Council, Inc.	3.39%	3.39%

Community Action Coalition for South Central Wisconsin, Inc.	11.62%	11.62%
Community Action Inc. of Rock and Walworth Counties	4.43%	4.43%
Couleecap, Inc.	3.68%	3.68%
Indianhead Community Action Agency, Incorporated	2.16%	2.16%
Lakeshore CAP, Inc. of Wisconsin	3.03%	3.03%
Newcap, Inc.	7.33%	7.33%
North Central Community Action Program, Inc.	3.21%	3.21%
Northwest Wisconsin Community Services Agency, Inc.	1.77%	1.77%
Racine/Kenosha Community Action Agency, Inc.	6.05%	6.05%
Community Relations- Social Development Commission	23.71%	23.71%
Southwestern Wisconsin Community Action Program, Inc.	2.25%	2.25%
West Central Community Action Agency, Inc.	4.22%	4.22%
Western Dairyland Economic Opportunity Council, Incorporated	2.54%	2.54%
Foundation for Rural Housing, Inc.	1.4%	1.4%
United Migrant Opportunity Services/UMOS Inc.	4%	4%
Total	92.87% [Auto-calculated]	92.87% [Auto-calculated]

7.3 Distribution Process: Describe the specific steps in the state’s process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about state legislative approval or other types of administrative approval (such as approval by a board or commission).

All eligible entities must submit an annual application to DCF outlining their plans for use of the CSBG funds and certifying that the agencies will comply with all federal and state requirements for CSBG grantees. DCF will send CSBG application forms to eligible entities on or before September 1, and completed applications are due back to DCF by October 1, in the year preceding the contract year, which begins on January 1.

The contract process begins once DCF approves an eligible entity’s annual CSBG application. DCF has a process through which the program staff, finance staff, budget staff, the division administrator, the Office of Legal Counsel, and the Secretary’s Office must review and approve the funding allocation plan and contract language. Once this process is completed, DCF routes contracts electronically through DocuSign for execution, generally about 30 days before the start of the contract period. Signatories then have 60 days to sign contracts. This timeline is driven by the receipt of DCF’s Notice of Award from OCS, which starts the process for each contract year.

DCF distributes CSBG funds to agencies on a reimbursement basis. Once the contract year is underway, agencies may submit claims for reimbursement by the 23rd day of the following month in order to be paid on the last day of that month. For instance, if an agency submits a reimbursement claim for January by the close of business on February 23, DCF will reimburse the agency on the last day of February. Agencies submit claims for reimbursement electronically using the DCF’s cost reporting system, known as SPARC (System for Payments and Reports of Contracts).

The SPARC Monthly Expenditure Reports for January through November must be submitted to DCF by close of business (4:30 pm Central Standard Time) on or before the 23rd day of the month for the previous month's activity. Late reports will be processed in the next month's payment cycle. The schedule for submitting SPARC Monthly Expenditure Reports is left to the discretion of each contract agency; reports may be submitted monthly or less frequently, depending on the agency's wish for reimbursement. It is not imperative that expenditures for a specific month be claimed within that month; they may be claimed on a subsequent month's expenditure report. The final expenditure report for the contract year is due within 90 days after the end of the grant period, which is March 31, of the year following the contract year.

DCF requires all grants to be paid by direct deposit into grantees' accounts. After an expenditure report is submitted, DCF will issue the reimbursement using direct deposit on the last day of the same month.

7.4 Distribution Timeframe: Does the State plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the Federal award? **Yes**

7.4a. If no, describe State procedures to ensure funds are made available to eligible entities consistently and without interruption. **N/A**

Note: Item 7.4 is associated with State Accountability Measure 2Sa and may pre-populate the State's annual report form.

7.5. Performance Management Adjustment: Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail.

Note: This information is associated with State Accountability Measure 2Sb and may pre-populate the State's annual report form.

Every quarter DCF monitors the Key Performance Indicator (KPI) of contract timeliness. Although Q4 2020 showed an increase to 28% of department contracts signed before the contract start date, the department still has room for improvement. If a contract is not signed timely (prior to the contract start date), this could cause a gap in service, which negatively impacts our programs and ultimately the children and families we serve. A Contract Timeliness Continuous Improvement Project has been launched with the purpose of identifying areas of improvement around timely contract signing. The project kicked off in 2021 with a survey for DCF's contract administrators to better understand any barriers they are facing related to contract timeliness and to identify other ways to support these efforts. The Contract Timeliness Continuous Improvement Project team will be implementing improvements and measuring the contract timeliness metric through 2022.

DCF is currently undergoing a full review of its CSBG Policy and Procedures Manual, which will be updated based on feedback from the eligible entities, OCS, and other sources, and will be incorporated by reference and content into subsequent State Plans. These efforts have been delayed due to the COVID-19 pandemic, but a survey of all eligible entities was conducted in October 2020, and that feedback will be incorporated into new policies and procedures and available for review and comment prior to finalization.

Administrative Funds [Section 675C(b)(2) of the CSBG Act]

- 7.6. Allocated Funds:** Specify the percentage of your CSBG planned allocation for administrative activities for the FFY(s) covered by this State Plan.

Year One 1.86% **Year Two** 1.86%

- 7.7. State Staff:** Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan.

Year One 2 **Year Two** 2

- 7.8. State FTEs:** Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan?

Year One 1.25 **Year Two** 1.25

Use of Remainder/Discretionary Funds [Section 675C(b) of the CSBG Act]

- 7.9. Remainder/Discretionary Funds Use:** Does the State have remainder/discretionary funds, as described in Section 675C(b) of the CSBG Act? **Yes**

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below.

Note: This response will link to the corresponding assurance, item 14.2.

Note: This information is associated with State Accountability Measures 3Sa and pre-populates the Annual Report, Module 1, Table E.7.

Use of Remainder/Discretionary Funds Years One and Two of the State Plan		
Remainder/ Discretionary Fund Uses	Planned \$ (per year)	Brief description of services/activities
a. Training/technical assistance to eligible entities	\$56,393	These planned services/activities will be described in State Plan Item 8.1 [Read Only]
b. Coordination of State-operated programs and/or local programs	\$0	These planned services/activities will be described in State Plan section 9, State Linkages and Communication. [Read Only]

c. Statewide coordination and communication among eligible entities	\$56,393	These planned services/activities will be described in State Plan section 9, State Linkages and Communication. [Read Only]
d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$0	[Narrative, 2500 characters] N/A
e. Asset-building programs	\$0	[Narrative, 2500 characters] N/A
f. Innovation programs/activities by eligible entities or other neighborhood groups	\$0	[Narrative, 2500 characters] N/A
g. State charity tax credits	\$0	[Narrative, 2500 characters] N/A
h. Other activities	\$355,232	[Narrative, 2500 characters] Wisconsin allocates 4% of the CSBG funding to the state's 11 federally recognized Indian tribes. This funding is included as part of the Family Services Program (FSP) funding the state provides to the tribes. FSP funds can be used for a wide range of human services, including: <ul style="list-style-type: none"> • Domestic abuse intervention; • Child welfare programs; • Initiatives that empower low-income individuals, families, and communities to overcome the effects of poverty; • Adolescent pregnancy prevention and parenting skills programs for adolescent parents; and • Childcare. Each tribe has the flexibility to include and emphasize the services that will meet the need of individual families and the tribal community.
Totals	\$468,018 [Auto-calculated]	

7.10. Remainder/Discretionary Funds Partnerships: Select the types of organizations, if any, the state plans to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in Table 7.9. **[Check all that apply and narrative where applicable]**

- ☐ The state directly carries out all activities (No partnerships)
- ☐ The state does not have remainder/discretionary funds
- ☐ The state partially carries out some activities
- ☐ CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds)

- ☐ Other community-based organizations
- ☒ State Community Action association
- ☐ Regional CSBG technical assistance provider(s)
- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☒ Tribes and Tribal Organizations
- ☐ Other

Note: This response will link to the corresponding CSBG assurance in Item 14.2.

- 7.11. Performance Management Adjustment:** Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

Note: This information is associated with State Accountability Measures 3Sb, and will pre-populate the State's annual report form.

DCF increased discretionary funding to the state association (WISCAP) for T/TA in FFY 2020 and 2021 due to requests from the state's CSBG eligible entities for additional assistance relating to Community Needs Assessments, to coordinate a statewide-analysis of Community Needs Assessment results, and development of standards for Community Needs Assessments in Wisconsin. DCF also increased discretionary funding to WISCAP in order to carry out ROMA training obligations previously assumed by the state. Because the state's CSBG eligible entities have not raised concerns about the manner in which DCF allocates CSBG discretionary funds, DCF will keep the increased allocations of discretionary funding to WISCAP as-is in order to meet these continuing needs of the network.

SECTION 8: State Training and Technical Assistance

8.1 Training and Technical Assistance Plan: Describe the state’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic. (CSBG funding used for this activity is referenced under item 7.9(a), Use of Remainder/Discretionary Funds. States should also describe training and technical assistance activities performed directly by state staff, regardless of whether these activities are funded with remainder/discretionary funds.)

Note: This information is associated with State Accountability Measure 3Sc and pre-populates the Annual Report, Module 1, Table F.1.

Training and Technical Assistance			
Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Dropdown options: <ul style="list-style-type: none"> FY1 – Q1 FY1 – Q2 FY1 – Q3 FY1 – Q4 FY2 – Q1 FY2 – Q2 FY2 – Q3 FY2 – Q4 Ongoing / Multiple Quarters All quarters 	Toggle Options: <ul style="list-style-type: none"> Training Technical Assistance Both 	Dropdown Options: <ul style="list-style-type: none"> Fiscal Governance/Tripartite Boards Organizational Standards – General Organizational Standards – for eligible entities with unmet standards on Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) Correcting Significant Deficiencies Among Eligible Entities Reporting ROMA Community Assessment Strategic Planning Monitoring Communication Technology Other 	[Narrative, 2500 characters] <p>If “Other” is selected in column 3, describe in this column</p>

Training and Technical Assistance Years One and Two of the State Plan			
Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Ongoing / Multiple Quarters	Technical Assistance	Fiscal	N/A
Ongoing / Multiple Quarters	Technical Assistance	Governance/Tripartite Boards	N/A
Ongoing / Multiple Quarters	Training	Organizational Standards – General	N/A

All quarters	Technical Assistance	Organizational Standards – technical assistance for eligible entities with unmet standards	N/A
Ongoing / Multiple Quarters	Training	Reporting	N/A
Ongoing / Multiple Quarters	Training	ROMA	N/A
Ongoing / Multiple Quarters	Both	Community Assessment	N/A
Ongoing / Multiple Quarters	Technical Assistance	Strategic Planning	N/A
Ongoing / Multiple Quarters	Technical Assistance	Correcting Significant Deficiencies Among Eligible Entities	N/A

8.1a. Training and Technical Assistance Budget: The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9a.): **[Prepopulated with the budget allocation for years one and two under 7.9a]**

8.1b. Training and Technical Assistance Collaboration: Describe how the state will collaborate with the State Association and other stakeholders in the planning and delivery of training and technical assistance.

DCF contracts with WISCAP on an annual basis to define and specify the delivery mechanism of training and technical assistance needs for the state's CSBG eligible entities. These needs are reviewed and approved by the WISCAP board of directors on an annual basis and incorporated in WISCAP's contractual Work Plan with DCF. DCF meets with WISCAP on a monthly basis to plan the delivery of training and technical assistance identified within the state and receives monthly activity reports on the status of task in WISCAP's Work Plan.

8.2. TAPs and QIPs: Does the State have in place Technical Assistance Plans (TAPs) and/or Quality Improvement Plans (QIPs) in place for all eligible entities with unmet organizational standards, if appropriate? **Yes**

Note: 8.2 is associated with State Accountability Measure 6Sb. QIPs are described in Section 678C(a)(4) of the CSBG Act. If the State, according to their corrective action procedures, does not plan to put a QIP in place for an eligible entity with one or more unmet organizational standards, the State should put a TAP in place to support the entity in meeting the standard(s).

8.2a. Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards.

DCF will put eligible entities with unmet Organizational Standards on a Technical Assistance Plan (TAPs), if appropriate. Circumstances under which a TAP may not be leveraged for an eligible entity with unmet Organizational Standards include: (1) an upcoming monitoring visit already scheduled during which DCF will re-evaluate the eligible entity's compliance with the Organizational Standards; (2) an eligible entity's deficiencies have already been corrected between the compliance deadline and the time at which a TAP would be issued for such deficiencies; and (3) extenuating

circumstances preventing an eligible entity from complying with an Organizational Standard have been presented to DCF, and the eligible entity has documented its ability to comply at a future date, approved by DCF.

Eligible entities on TAPs will receive T/TA until Organizational Standards are met. DCF evaluates each eligible entity's compliance with all 58 Organizational Standards on an annual basis through a desk audit, and under certain circumstances more frequently, including the implementation of a TAP or a scheduled monitoring visit. DCF will: (1) provide relevant resources to the eligible entity out of compliance, including those from local, state, and national partners; (2) refer the eligible entity to WISCAP for T/TA; and/or (3) consult with the eligible entity directly until the deficiencies are corrected or it is determined that corrective action will need to take place.

8.3. Training and Technical Assistance Organizations: Indicate the types of organizations through which the state plans to provide training and/or technical assistance as described in Item 8.1, and briefly describe their involvement. (Check all that apply.) **[Check all that applies and narrative where applicable]**

- ☐ CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) **[Narrative, 2500 characters]**
- ☐ Other community-based organizations
- ☒ State Community Action Association
- ☐ Regional CSBG technical assistance provider(s)
- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other **[Narrative, 2500 characters]**

8.4. Performance Management Adjustment: How is the State adjusting the training and technical assistance plan under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measures 3Sd and may pre-populate the State's annual report form.

DCF increased training and technical assistance related to ROMA for CSBG eligible entities and their board members under the FY20-21 State Plan and is not making any further adjustments under this State Plan. Eligible entities have expressed ROMA needs are being met through WISCAP's training and technical assistance, and we are continuing Community Needs Assessment work started under the FY20-21 State Plan.

SECTION 9: State Linkages and Communication

Note: This section describes activities that the State may support with CSBG remainder/discretionary funds, described under Section 675C(b)(1) of the CSBG Act. The State may indicate planned use of remainder/discretionary funds for linkage/communication activities in Section 7, State Use of Funds, items 7.9(b) and (c).

- 9.1 State Linkages and Coordination at the State Level:** Describe the linkages and coordination at the State level that the State plans to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Describe or attach additional information as needed.

Note: This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa and pre-populates the Annual Report, Module 1, Item G.1.

- ☒ State Low Income Home Energy Assistance Program (LIHEAP) office
- ☒ State Weatherization office
- ☒ State Temporary Assistance for Needy Families (TANF) office
- ☒ State Head Start office
- ☒ State public health office
- ☒ State education department
- ☒ State Workforce Innovation and Opportunity Act (WIOA) agency
- ☐ State budget office
- ☒ Supplemental Nutrition Assistance Program (SNAP)
- ☒ State child welfare office
- ☒ State housing office
- ☐ Other

- 9.2 State Linkages and Coordination at the Local Level:** Describe the linkages and coordination at the local level that the State plans to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)).

Note: This response will link to the corresponding CSBG assurances, items 14.5 and 14.6, and pre-populates the Annual Report, Module 1, Item G.2.

As part of the State's CSBG monitoring process, DCF requires each eligible entity to provide evidence that it has strong collaborative relationships with local governmental and other social service organizations, especially antipoverty programs in its community. DCF will work with eligible entities to identify the local and regional anti-poverty networks in which they participate, in order for DCF to gain a greater understanding of the linkages and collaborations that exist across the state. The CSBG contract manager or other designated DCF staff in lieu of the contract manager will attend four of these local and regional network meetings each year.

9.3 Eligible Entity Linkages and Coordination

- 9.3a State Assurance of Eligible Entity Linkages and Coordination:** Describe how the State will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)).

Note: This response will link to the corresponding CSBG assurance, item 14.5. and pre-populates the Annual Report, Module 1, Item G.3a.

As part of the state's CSBG monitoring process, DCF requires each eligible entity to provide evidence that it has strong collaborative relationships with other antipoverty organizations in its community. In Wisconsin, CSBG funds are a critical resource for convening and facilitating community-based discussion about local challenges and effective solutions for low-income families. In communities across the state, eligible entities host or participate in work groups, coordinated community responses, professional organizations, councils, task forces, civic groups, and other forums that actively work towards improved outcomes for people in need. This activity generally results in more effective planning and service delivery in addition to new program development to address identified service gaps. It also ensures that services are not duplicated within local communities. In many cases, collaboration may secure more resources, such as in-kind donations, volunteer time, and corporate support. Collaboration may also lead to greater community awareness of the problems of low-income individuals and families. Schools, churches, county human service agencies, and other recognized community institutions often provide a significant volume of referrals to eligible entities and rely on eligible entities' responsiveness to meet the urgent and emergent needs of the families they serve.

- 9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps:** Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act.

Note: This response will link to the corresponding CSBG assurance, item 14.3b. and pre-populates the Annual Report, Module 1, Item G.3b

Because the needs of low-income families and households are often complex and greater than the program offerings in any one agency, Wisconsin's established network of eligible entities have necessarily developed strong referral relationships with public and private agencies. All of the CSBG providers in Wisconsin actively engage in outreach strategies. Some agencies have staff onsite at job centers, family resource centers, and other locations where people in need can access multiple services more efficiently. Eligible entities provide in-services and training for referral sources. All have web sites and provide brochures and program information at key contact sites in their communities. Agencies also actively seek information that would help them more effectively identify and engage families; examples include the use of energy assistance lists by the state's weatherization programs, and the use of food pantries and Head Start

programs to recruit low-income board and committee members and engage volunteer support.

- 9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities:** Does the State intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)?

Note: This response will link to the corresponding CSBG assurance, item 14.5.

No

- 9.4a WIOA Combined Plan:** If the State selected “yes” under item 9.4, provide the CSBG-specific information included in the State’s WIOA Combined Plan. This information includes a description of how the State and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy.

- 9.4b. Employment and Training Activities:** If the State selected no under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the state and by eligible entities providing activities through the WIOA system.

Among Wisconsin’s eligible entities, several have management staff that are members of regional Workforce Development Boards, two have staff stationed at regional Job Centers, two more receive WIOA funding to operate Job Centers, and four agencies receive WIOA funding to provide adult and/or youth employment services.

DCF has several representatives serving on the Wisconsin Department of Workforce Development’s Job Center Task Force to assess the current state of the Wisconsin Job Center system related to effective program coordination and bring forth recommendations to the Job Center Task Force for future improvements by investigating best practices, recommending actions and policies, and identifying tools. The Task Force will also leverage statewide workforce and work support programs through effective use of physical locations, staff, joint policies/guidelines, technology, and resource sharing including identifying gaps, as well as evaluate funding sources and ways to leverage resources to support a seamless and comprehensive delivery of services to customers that leads to improved employment and training outcomes.

DCF members of the Task Force brief DCF monthly on these efforts, with identified deliverables being incorporated into a work plan for FY2022.

- 9.5. Emergency Energy Crisis Intervention:** Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act).

Note: This response will link to the corresponding CSBG assurance, item 14.6.

The Wisconsin Department of Administration (DOA) administers the federally funded Low Income Home Energy Assistance Program (LIHEAP) and the Public Benefits Energy Assistance Program, which is funded through fixed charges on electric utility customers. Five CSBG eligible entities operate LIHEAP. LIHEAP and its related services help approximately 230,000 Wisconsin households annually. In addition to regular heating and electric assistance, specialized services include:

- Emergency fuel assistance;
- Counseling for energy conservation and energy budgets;
- Pro-active copayment plans;
- Targeted outreach services; and
- Emergency furnace repair and replacement.

Services are provided locally through:

- County human services offices;
- Tribal governments; and
- Private non-profit or other government agencies, including four CSBG eligible entities that serve as sub-contractors for county governments.

DOA also administers the state's Weatherization Assistance Program. Twelve CSBG eligible entities operate weatherization services under this program. They all have access to the statewide database listing recipients of energy assistance, and routinely reach out to those households to offer weatherization services as appropriate.

- 9.6. Faith-based Organizations, Charitable Groups, Community Organizations:** Describe how the State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act.

Note: this response will link to the corresponding assurance, item 14.9

As part of the state's CSBG monitoring process, DCF requires each eligible entity to provide evidence that it coordinates and forms partnerships with other organizations, including faith-based organizations, charitable groups, and other community organizations. DCF also requires eligible entities to report information about their partnerships on the annual application for CSBG funds and the CSBG Annual Report.

On the 2019 CSBG Annual Report, Wisconsin's eligible entities reported that they worked with a total of 339 faith-based organizations and 991 non-profit organizations. In addition, they reported working with 245 school districts and 1,341 for-profit businesses.

In FFYs 2022 and 2023, Wisconsin's eligible entities will continue collaborating with large numbers of other local organizations, and DCF will continue to assist in the coordination of these collaborations as able.

9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources: Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

Note: this response will link to the corresponding assurance, item 14.3c.

Wisconsin's eligible entities coordinate CSBG funds with a wide variety of other funding. They access additional federal and state grant resources that support Head Start; weatherization; housing assistance and development; employment and training programs; and emergency food services. Agencies also have garnered the ongoing financial support of United Way, community foundations, and other local philanthropic organizations and individuals. In some counties, municipal and/or county governments contract with eligible entities to provide services. On the 2019 Annual Report, the eligible entities reported that they administered over \$177.8M in leveraged funds. CSBG funds represented only 4.5% of the eligible entities' total funds in 2019; however, its flexibility is vital to the entities' ability to provide required match for other funds, respond to new needs that arise in their communities, and support innovative community-wide collaborations.

A key way that many eligible entities use CSBG in coordination with other resources is as required match for two important U.S. Department of Housing and Urban Development (HUD) programs that support services for the homeless and households that are at-risk of becoming homeless. These are:

1. The Emergency Solutions/Transitional Shelter/Homeless Prevention (ETH) grants, administered by the Wisconsin Department of Administration, Division of Housing, Energy, and Community Resources and used for emergency shelters for the homeless, eviction prevention, rapid re-housing, and transitional housing assistance; and
2. HUD Continuum of Care funding which supports community-wide responses to homelessness.

The Foundation for Rural Housing also uses CSBG funds to cover staffing and other expenses necessary for the operation of the state-funded Critical Assistance program, which supports homelessness prevention services for rural areas of the state.

9.8. Coordination among Eligible Entities and State Community Action Association: Describe State activities for supporting coordination among the eligible entities and the State Community Action Association.

Note: This information will pre-populate the Annual Report, Module 1, Item G.5.

DCF will reserve a portion of its discretionary CSBG funding to support quarterly meetings and the Annual Conference of the statewide community action network that are convened by WISCAP. These meetings provide an opportunity for the eligible entities' executive directors and other leadership staff to meet, discuss issues of common concern, and receive updates from representatives from DCF and other state departments that provide funding to the eligible entities.

- 9.9. Communication with Eligible Entities and the State Community Action Association:** In the table below, describe the State’s plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan on the topics listed below.

For any topic that is not applicable, select *Not Applicable*.

Communication Plan			
Subject Matter	Expected Frequency [daily, weekly, twice-monthly, monthly, quarterly, semi-annually, annually, biannually, triennially, as-needed, upon request, not applicable]	Format [newsletter, mailing, meetings/presentations, blog, email, website, social media, webinar, 1:1, phone calls, public notice, letters/hard copies, other]	Brief Description of “Other”
Upcoming Public and/or Legislative Hearings	Biannually, as-needed	Public notice and/or email	N/A
State Plan Development	Biennially, as-needed, upon request	Meetings/presentations, email, phone calls, public notice	N/A
Organizational Standards Progress	Annually, as-needed	Meetings/presentations, email, phone calls	N/A
State Accountability Measures Progress	Annually, as-needed	Meetings/presentations, email	N/A
Community Needs Assessments/Community Action Plans	Annually, as-needed	Meetings/presentations, email, 1:1, phone calls	N/A
State Monitoring Plans and Policies	Annually, as-needed, upon request	Meetings/presentations, email, website, 1:1, phone calls	N/A
Training and Technical Assistance (T/TA) Plans	Quarterly, as-needed, upon request	Meetings/presentations, email, website, webinar, 1:1, phone calls, letters/hard copies	N/A
ROMA Performance and Management	Annually	Meetings/presentations, email, website, webinar, 1:1, phone calls	N/A
State Interagency Coordination	As-needed	Meetings/presentations, email, phone calls	N/A
CSBG Legislative/Programmatic Updates	Monthly	Meetings/presentations, email	N/A
Tripartite Board Requirements	Quarterly, as-needed	Meetings/presentations, email, 1:1, phone calls	N/A

- 9.10. Feedback to Eligible Entities and State Community Action Association:** Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures.

Note: This information is associated with State Accountability Measure 5S(iii) and will pre-populate the Annual Report, Module 1, Item G.6.

When DCF receives feedback from OCS regarding the State’s performance on State Accountability Measures, the CSBG contract manager will forward the report from OCS to the eligible entities and WISCAP within 60 calendar days. In addition to sharing the State’s

performance data with the eligible entities and WISCAP, DCF will also provide information about any actions DCF plans to take in order to improve the state's performance.

- 9.11. Performance Management Adjustment:** Describe any adjustments the state made to the Communication Plan in this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

Note: This information is associated with State Accountability Measures 7Sb; this response may pre-populate the state's annual report form.

DCF is not making any adjustments to the Communication Plan for this State Plan compared to past plans. In the FY20-21 State Plan, DCF decreased its CSBG Legislative/Programmatic updates from weekly to monthly, via email and/or at WISCAP member meetings, and only more frequently as-needed, in the spirit of efficiency and brevity. Based on feedback from eligible entities in a survey conducted in August 2021, DCF will continue to only provide updates that are more frequent when there is a direct need, instead of flooding the inboxes of the eligible entities with what is, often times, repetitive or non-pertinent information.

DCF will resume a coordinated monthly meeting with WISCAP staff related to the eligible entities' training and technical assistance needs. DCF has engaged WISCAP in more intensive joint planning for T/TA for the eligible entities in an effort to increase collaboration and build a stronger T/TA partnership for Wisconsin's eligible entities. DCF sees a benefit to holding calls, in-person meetings, or, at minimum, email exchanges on at least a monthly basis, in addition to WISCAP providing regular detailed reports to DCF for the T/TA activities it provides under its CSBG-funded contract with DCF.

SECTION 10: Monitoring, Corrective Action, and Fiscal Controls

Monitoring of Eligible Entities (Section 678B(a) of the CSBG Act)

- 10.1.** Specify the proposed schedule for planned monitoring visits including: full on-site reviews; on-site reviews of newly designated entities; follow-up reviews – including return visits to entities that failed to meet state goals, standards, and requirements; and other reviews as appropriate.

This is an estimated schedule to assist States in planning. States may indicate “no review” for entities the State does not plan to monitor in the performance period.

Note: This information is associated with State Accountability Measure 4Sa(i); this response pre-populates the Annual Report, Module 1, Table H.1.

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)	Brief Description of “Other”
Will auto-populate from item 5.1	Dropdown Options: <ul style="list-style-type: none"> • Full onsite • Newly Designated • Follow-up • Other • No review 	Dropdown Options: <ul style="list-style-type: none"> • FY1 Q1 • FY1 Q2 • FY1 Q3 • FY1 Q4 • FY2 Q1 • FY2 Q2 • FY2 Q3 • FY2 Q4 	Select a date	[Narrative, 2500 characters] If “Other” is selected in column 2, describe in this column
ADVOCAP, Inc.	Full onsite	FY1 Q3	June 24, 2019	
CAP Services, Inc.	No review		September 13, 2021	
Central Wisconsin Community Action Council, Inc.	Full onsite	FY1 Q2	November 6, 2018	
Community Action Coalition for South Central Wisconsin, Inc.	No review		September 20, 2021	
Community Action Inc. of Rock and Walworth Counties	Full onsite	FY1 Q1	October 11, 2021	
Coulecap, Inc.	No review		July 12, 2021	
Indianhead Community Action Agency, Incorporated	Follow-up	FY1 Q1	May 1 and 2, 2019	
Lakeshore CAP, Inc. of Wisconsin	No review		March 15, 2021	
Newcap, Inc.	Full onsite	FY1 Q4	July 15, 2019	
North Central Community Action Program, Inc.	No review		March 22, 2021	
Northwest Wisconsin Community Services Agency, Inc.	No review		August 23, 2021	
Racine/Kenosha Community Action Agency, Inc.	No review		July 26, 2021	

Community Relations- Social Development Commission	No review		April 19, 2021	
Southwestern Wisconsin Community Action Program, Inc.	Full onsite	FY1 Q4	August 21, 2019	
West Central Community Action Agency, Inc.	Full onsite	FY1 Q1	December 13, 2017	
Western Dairyland Economic Opportunity Council, Incorporated	Full onsite	FY1 Q1	July 9 and 10, 2018	
Foundation for Rural Housing, Inc.	Full onsite	FY1 Q4	June 18, 2019	
United Migrant Opportunity Services/UMOS Inc.	Full onsite	FY1 Q1	December 13, 2018	

- 10.2. Monitoring Policies:** Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink.

Attachment 3: CSBG Monitoring Tool

- 10.3. Initial Monitoring Reports:** According to the State's procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities?

Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the state's annual report form.

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Corrective Action, Termination and Reduction of Funding and Assurance Requirements (Section 678C of the Act)

- 10.4. Closing Findings:** Are State procedures for addressing eligible entity findings/deficiencies, and the documenting closure of findings included in the state monitoring protocols attached above? **No**

10.4a. If "no," describe State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings.

If DCF determines through an on-site monitoring visit that an agency is not in compliance with state and/or federal CSBG requirements, DCF will identify the specific deficiencies in a monitoring report issued to the agency within 30 days of the monitoring review. The monitoring report will document the basis for DCF's determination, and the agency will be asked to develop and propose a plan and timeline within 60 days to address the issues identified in the monitoring report. This plan must identify the actions that the agency will take to correct the deficiency within a reasonable period. Alternately, the agency may provide documentation that corrections have already been made, and therefore further corrective action is not needed for the issue(s) in question.

DCF will have 30 days to either approve the agency's proposed plan or specify the reasons why the proposed plan cannot be approved. In alignment with guidance from CSBG Information

Memorandum 138 (State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42 U.S.C. § 9914), DCF will work with the eligible entity to develop a Technical Assistance Plan (TAP) around CSBG requirements that the eligible entity can meet in a reasonable time frame with targeted technical assistance. For circumstances in which an eligible entity needs more intensive work to meet CSBG requirements, and has serious deficiencies that threaten its status as a CSBG eligible entity, DCF will work with the eligible entity to establish a Quality Improvement Plan (QIP) that lays out clear timelines and benchmarks for progress. DCF will offer training and assistance as appropriate to help the agency correct deficiencies. If an agency fails to make progress on a QIP, DCF will follow the process outlined in Section 678C of the CSBG Act and the guidelines provided in CSBG Information Memorandum 116 (Corrective Action, Termination, or Reduction of Funding).

- 10.5. Quality Improvement Plans (QIPs):** How many eligible entities are currently on Quality Improvement Plans?

Note: The QIP information is associated with State Accountability Measures 4Sc.

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- 10.6. Reporting of QIPs:** Describe the State's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP?

Note: This item is associated with State Accountability Measure 4Sa(iii).

Once a QIP is established for an eligible entity and approved by DCF, DCF will send an email to OCS staff within 30 calendar days to report that the QIP is in place. DCF will follow guidance provided by OCS in terms of reporting the specific CSBG requirements addressed by the QIP, and providing follow-up reports of the eligible entity's progress in meeting these requirements.

- 10.7. Assurance on Funding Reduction or Termination:** The state assures that "any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)" per Section 676(b)(8) of the CSBG Act. **Yes**

Note: This response will link with the corresponding assurance under item 14.8.

Policies on Eligible Entity Designation, De-designation, and Re-designation

- 10.8. Eligible Entity Designation:** Do the State CSBG statute and/or regulations provide for the designation of new eligible entities? **Yes**

10.8a. New Designation Citation: If yes, provide the citation(s) of the law and/or regulation.

Wis. Stat. ss. 49.265(2)(a)1.b. to 49.265(2)(a)1.c. state that a community action agency must receive "the approval of the secretary" of DCF and "the approval of the county

board of supervisors, if the community action agency serves an entire county, or, if the agency serves a city, village or town, receives the approval of the city's, village's or town's legislative body.”

10.9. Eligible Entity Termination: Do state CSBG statute and/or regulations provide for termination of eligible entities? **Yes**

10.9a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of new eligible entities.

DCF would begin the process of de-designating an eligible entity only if an entity fails over a period of time to take action to resolve significant findings that DCF had identified through the CSBG monitoring process, the annual CSBG Organizational Standards assessment, or another documented method that an agency is not in compliance with state and/or federal CSBG requirements. This would take place after an agency has failed to make adequate progress through the normal corrective action planning process, has been identified as “high risk”, and has had the opportunity to develop and implement a Quality Improvement Plan (QIP). DCF would notify OCS within five business days in the event that it had identified an eligible entity as high risk. DCF would only begin the process of de-designating a high risk agency if it failed to cooperate with DCF and did not develop a QIP or make progress on its approved QIP.

In alignment with Section 678(b)(8) of the CSBG Act and Wis. Stat. s. 49.625(2)(c), DCF would only de-designate an eligible entity through a joint decision by both the legislative body of the county, city, village, or town that originally designated the eligible entity and DCF. At least 90 days before rescinding approval, DCF would notify the agency of its reasons for the action and hold a public hearing in the community.

If after holding the public hearing, DCF finds cause to terminate or reduce funding, DCF will initiate proceedings to terminate the designation of or reduce the funding to the eligible entity. DCF would notify both the eligible entity and OCS of its decision. The eligible entity would have 30 days following notification of DCF’s decision to request a federal review by the Department of Health and Human Services (DHHS). In alignment with OCS Information Memorandum 116, DCF will provide the affected eligible entity with information on how to request a federal review.

If the eligible entity requests a federal review, DCF will not discontinue present or future funding until DHHS responds to the request. If the eligible entity does not request a federal review within the 30-day limit, DCF’s decision will be effective at the expiration of the 30-day period.

10.10. Eligible Entity Re-Designation: Do the state CSBG statute and/or regulations provide for a re-designation of an existing eligible entity? **No**

10.10a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for re-designation of existing eligible entities.

In accordance with the CSBG Act, if a county in Wisconsin is not covered or ceases to be covered by an eligible entity, and the state decides to serve that county, the state will first request an existing Community Action Agency (CAA) that is located and provides services in a contiguous county to serve the unserved county. If no existing CAA is located in a contiguous county, a request will be made to the CAA located within the closest proximity, or another existing CAA within reasonable proximity to the unserved county.

If DCF decides to serve a county not currently served by a CAA, the CSBG contract manager may convene a meeting with the representatives of the county, the Wisconsin Community Action Program Association, and any existing CAAs that are interested in becoming the CAA for the county.

An existing CAA interested in becoming the CAA for the county and representatives of the county must submit a joint letter of intent by the date designated by DCF in order to be eligible for funding in that county during the next year. DCF will adjust the resource allocation in the next CSBG State Plan. The CAA must include a plan and budget for the county in its annual CSBG application. The plan must include specific activities that will occur in the county. The plan also must include a resolution from the county board designating the agency as the CAA provider in that county.

If existing CAAs decline to serve the unserved county, the creation of a new CAA is possible under Wis. Stat. s. 49.625(2). Such an entity would be a private nonprofit organization that is geographically located in the area or in an area contiguous to, or within reasonable proximity to, the unserved area and is capable of meeting all requirements of the CSBG program. DCF would solicit applications from interested organizations through a Request for Proposal process. The board of supervisors for the unserved county would need to approve a resolution to designate the agency as the CAA for that county.

In alignment with OCS Information Memorandum 116, if no private nonprofit organization is identified or determined to be qualified as an eligible entity to serve the area, DCF may designate an appropriate political subdivision of the State to serve as an eligible entity for the area. Any nonprofit or public agency receiving CSBG funds must meet the tripartite board requirements specified in Section 676B of the CSBG Act.

Fiscal Controls and Audits and Cooperation Assurance

- 10.11. Fiscal Controls and Accounting:** Describe how the state's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).

When any federal award is received, DCF finance staff establishes several reporting categories specific to that award in the general ledger of the state's financial system. These reporting categories segregate state disbursements by recipient type and by expenditure type. Administrative expenses are accumulated in a separate account and monitored to ensure that they do not exceed the maximum 5% administrative cap established by the CSBG Act.

Eligible entities receive disbursement of their funding after reporting expenditures through a separate payment system. Eligible entities report their expenditures by defined categories, identifying when expenditures were made. This payment system tracks activity by eligible entity and expenditure type, with built-in caps to prevent eligible entity payments from exceeding the contract award. It also maintains historical data which can be queried. The CSBG contract manager uses this data to track funding usage by eligible entity to ensure awards are being fully utilized. DCF finance staff prepares journal entries for funds distribution from this payment system and post the journal entries to the state's general ledger.

Each eligible entity is required to have an annual audit to ensure that grant funds received have been used according to the federal statutes, regulations, and terms and conditions of the award.

DCF finance staff prepares reports periodically to review disbursement of grants. Expenditures are sorted by date to ensure that only items properly obligated by the end of the award period and liquidated within 90 days of that date are reported on the final SF-425 Federal fiscal report. Only items liquidated by the reporting date are included in interim reports.

- 10.12. Single Audit Management Decisions:** Describe State procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number.

Note: This information is associated with State Accountability Measure 4Sd.

All of the eligible entities operate on a calendar year basis, with their audits covering the period of January 1, through December 31; except for one agency that operates on a July 1, through June 30, fiscal year. Each eligible entity is required by DCF contract to annually submit a copy of its single audit by six months after the end of its fiscal year. The single audits must be conducted by an independent accounting firm in accordance with generally accepted accounting principles.

The eligible entities' audits are collected and reviewed by DCF finance staff. If the auditor indicated that a management letter was issued, DCF finance staff request the management letter if it is not included in the original reporting package. DCF finance staff note any audit findings or management letter comments on their desk review checklist. DCF finance staff review the management response/corrective action plan to determine if it appears adequate to address the finding(s). If applicable, DCF finance staff also review prior year findings to determine if the corrective action plan from the prior year has been put into place.

DCF finance staff notifies the CSBG contract manager of any findings and proposed corrections. The CSBG contract manager contacts the eligible entity (if necessary) to clarify proposed action or confirm that the corrective action was completed as scheduled. DCF finance staff also document any additional follow-up considered necessary. The eligible entity's response to DCF finance staff is shared with the CSBG contract manager to verify that all concerns have been adequately addressed.

Once all findings are adequately addressed, DCF finance staff sends a close-out letter to the eligible entity stating acceptance of the audit reporting package and closing DCF's interest in the audit. Any funds due back based on audit findings would be requested through this letter. If a return of funds is requested, a Notice of Appeal rights is also included.

- 10.13. Assurance on Federal Investigations:** Will the State “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under 676(b)(7) of the CSBG Act. **Yes**

Note: This response will link with the corresponding assurance, item 14.7

- 10.14. Performance Management Adjustment:** Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

Note: This item is associated with State Accountability Measure 4Sb and may pre-populate the state's annual report form.

DCF is in the process of making adjustments to its monitoring procedures, for review and comment from CSBG eligible entities, OCS, and other sources. However, DCF is currently still in the initial drafting phase of new procedures so will not be implementing such adjustments concurrent with this State Plan.

SECTION 11: Eligible Entity Tripartite Board

- 11.1. Tripartite Board Verification:** Verify which of the following measures are taken to ensure that the state verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act? **[Check all that applies and narrative where applicable]**

- ☒ Attend Board meetings
- ☒ Organizational Standards Assessment
- ☒ Monitoring
- ☒ Review copies of Board meeting minutes
- ☒ Track Board vacancies/composition
- ☐ Other

- 11.2. Tripartite Board Updates:** Provide how often the state requires eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.

- ☐ Annually
- ☐ Semiannually
- ☒ Quarterly
- ☐ Monthly
- ☐ Other

- 11.3. Tripartite Board Representation Assurance:** Describe how the state will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act.

Note: This response will link with the corresponding assurance, item 14.10.

As part of the State's CSBG monitoring process, DCF requires each eligible entity to provide evidence that it has policies and procedures in place by which individuals or organizations can petition for adequate representation on the eligible entity's board. Eligible entities typically meet this requirement by having a policy and procedure outlined in their bylaws. If an eligible entity fails to meet this requirement, this would result in a finding in the CSBG monitoring report. DCF would then require the eligible entity to develop a Corrective Action Plan within 60 days that shows how the eligible entity will resolve the finding within a reasonable timeframe (i.e., 12 months or less) by formally adopting a policy and procedures by which individuals or organizations can petition for adequate representation on its board. DCF will provide technical assistance as needed.

- 11.4.** Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act? **No**

11.4a. If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board.

DRAFT

Section 12: Individual and Community Eligibility Requirements

12.1. Required Income Eligibility: What is the income eligibility threshold for services in the State?
[Check one item below.]

- ☒ 125% of the HHS poverty line
- ☐ X % of the HHS poverty line (fill in the threshold): _____% [insert up to a 3 digit percentage]
- ☐ Varies by eligible entity

12.1a. Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition.

Individuals and families receiving CSBG supported services must have incomes at or below 125% of the federal poverty level, as defined by the federal Office of Management and Budget (OMB). CSBG recipient and sub-recipient agencies are required to conduct eligibility screenings as part of their client intake process. Agencies must have written policies and procedures for each program they administer that uses CSBG funds to ensure that CSBG funds are only used to support individuals and families who meet the income eligibility requirement. Agencies may determine the types of documentation they require for income verification. If a household's income is at or below 125% of the federal poverty level upon intake into the program, the individual (or family) is eligible to continue receiving services until the agency conducts a formal reassessment.

CSBG eligibility is based on household income. A household is defined as all individuals living within the same household who are related to one another by birth or marriage. The gross (pre-tax) income of all individuals in the household must be counted in order to assess eligibility for CSBG services.

Often agencies support a single program by combining CSBG dollars with funds from other sources that have different income eligibility requirements from the CSBG program. In these cases, those served must be screened for CSBG eligibility and identified as CSBG-eligible or not CSBG-eligible. Agencies must use proportional ratios to demonstrate client eligibility tied to funding streams. For example, if CSBG supports 30% of a program's costs, then the agency must be able to demonstrate that at least 30% of the clients served have incomes at or below 125% of the federal poverty level.

Agencies may set other eligibility criteria for programs supported by CSBG funds, including non-income related eligibility criteria. For example, a program may only serve homeless families with minor children, or an agency may choose to set an income eligibility limit for a specific program at lower than 125% of the federal poverty level. However, agencies may not discriminate on the basis of race, color, national origin, sex, age, religion, or disability. In addition, agencies cannot ban non-citizens from CSBG programs solely on the basis of their immigration status unless such exclusion is authorized by another statute.

- 12.2. Income Eligibility for General/Short Term Services:** Describe how the state ensures eligible entities generally verify income eligibility for those services with limited in-take procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance.

For all programs that are supported by CSBG funds, eligible entities must provide reasonable, documented evidence that the proportion of program clients who are CSBG-eligible is equal to or greater than the proportion of program costs paid with CSBG funds, or the proportion of program staff time devoted to serving CSBG-eligible clients is equal to or greater than the proportion of program costs paid with CSBG funds. For example, if CSBG supports 30% of a program's costs, then the agency must be able to demonstrate that at least 30% of the clients served have incomes at or below 125% of the federal poverty level, or at least 30% of staff time is allocated to serving CSBG-eligible clients.

When CSBG funds support short-term services with limited intake procedures, such as emergency food assistance, and individual income verification is not possible or practical, the eligible entity must provide an estimate with a reasonable, documented basis, that the proportion of program clients who are CSBG-eligible is equal to or greater than the proportion of program costs paid with CSBG funds. For example, such an estimate could be based on periodic, anonymous surveys of clients' self-reported income. Alternately, the eligible entity could provide evidence that due to the venue in which a particular service is provided, such as meals provided in an emergency homeless shelter, it could reasonably be assumed that clients meet the CSBG income guidelines.

- 12.3. Community-targeted Services:** Describe how the state ensures eligible entities' services target and benefit low-income communities for those services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations).

When CSBG funds are used for services that provide a community-wide benefit, eligible entities must be able to present evidence that the service benefits members of the community who are affected by poverty and is aligned with the needs of low-income community members as identified by the eligible entity's most recent triennial Community Needs Assessment. The eligible entity must use data from the U.S. Census or equivalent source to demonstrate that the services are located in a community in which a relatively high proportion of residents are living in poverty.

SECTION 13: Results Oriented Management and Accountability (ROMA) System

- 13.1. Performance Measurement System:** Identify the performance measurement system that the state and all eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act.

Note: This response will also link to the corresponding assurance, item 14.12. and will pre-populate the Annual Report, Module 1, Item I.1.

The Results Oriented Management and Accountability (ROMA) System

- 13.1a.** ROMA Description: If ROMA was selected in item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA.

As stated in its CSBG Policy and Procedures Manual, DCF requires that all eligible entities have: "an annual Community Action Plan developed under the guidance of the agency's board of directors, which provides a basis for directing and monitoring the agency's efforts in addressing poverty-related problems in the community. This plan outlines the services and activities the agency will implement, based on the findings of the Community Needs Assessment...The board of directors' record should clearly document their ongoing involvement and leadership in the development, implementation, and evaluation of the Community Action Plan. Board ratification of a staff-prepared plan does not demonstrate adequate involvement and leadership in compliance with the CSBG Act.

The board should establish processes to ensure ongoing involvement and participation in the development, implementation, and evaluation of the plan that is responsive to the major needs of the low-income population in the community served by the contract agency. The board must also ensure that Results Oriented Management and Accountability (ROMA) goals and National Performance Indicators (NPIs) are incorporated in the formulation of the plan. For this reason, contract agencies' board members must receive ROMA training on an annual basis..."

"The Community Action Plans must include the following components:

1. A description of the major poverty-related problems identified by the agency's most recent Community Needs Assessment;
2. Prioritization of the identified problems by magnitude and severity;
3. Identification of current levels of anti-poverty efforts, including an inventory of current local initiatives that exist to address the identified poverty-related problems and any major service gaps at the local level;
4. Selection of problems that the agency will target for direct intervention and the specific programmatic approaches the agency will take;
5. Goals, based on ROMA goals and NPIs, that state in precise terms what the agency proposes to accomplish through its activities during the period of the plan; and
6. A plan for ongoing evaluation of the agency's activities."

Furthermore, DCF's CSBG Policy and Procedures Manual states that all eligible entities' "board members must be familiar with ROMA concepts and participate in periodic updates and review of the agency's Community Action Plan..., which uses ROMA as the basis of setting and tracking performance goals for the agency's programs and services."

13.1.b If an alternate systems was chosen in item 13.1, describe the system the state will use for performance measurement.

13.2. Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act.

Note: This response will also link to the corresponding assurance, item 14.12.

- ☒ CSBG National Performance Indicators (NPI)
- ☐ NPIs and others
- ☐ Others

DCF will require eligible entities to use the CSBG National Performance Indicators to measure their performance in promoting self-sufficiency, family stability, and community revitalization.

13.3. Eligible Entity Support: Describer how the state supports the eligible entities in using ROMA or alternative performance measurement system.

Note: The activities described under item 13.3 may include activities listed in "Section 8: Training and Technical Assistance." If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, item 14.12.

DCF supports the eligible entities in using the ROMA system in the following ways:

1. Providing ROMA training for eligible entities' staff: a WISCAP staff member completed all steps to become a certified ROMA trainer in 2019, and several eligible entities' staff members also received training to become Nationally Certified ROMA Implementers (NCRI) in 2020. DCF also provides funding to WISCAP to provide targeted T/TA to all eligible entities. Training events will continue in FFYs 2022 and 2023, on at minimum an annual basis.
2. Providing ROMA training for eligible entities' boards of directors: WISCAP developed a ROMA training video specifically geared toward board members, available on-demand at: <https://www.youtube.com/watch?v=ph2pCwfu5z8>. WISCAP and DCF are also providing one-on-one or group consultations on ROMA throughout the state.
3. Providing training and technical assistance related to the CSBG Annual Report: The CSBG contract manager provided live training sessions to help agency staff prepare to complete the 2020 CSBG Annual Report in October 2020 and February 2021, in addition to updates and presentations at quarterly WISCAP meetings. DCF will

continue to provide this training on, at minimum, an annual basis in FFY2022 and 2023.

- 13.4. Eligible Entity Use of Data:** Describe how the state plans to validate that the eligible entities are using data to improve service delivery.

Note: This response will also link to the corresponding assurance, item 14.12.

During the CSBG monitoring process, DCF asks the following questions to assess the extent to which an eligible entity uses data to improve service delivery:

- Are all agency programs tied to at least one ROMA objective (NPI)?
- Is the agency able to obtain an unduplicated count of its participants for the CSBG Annual Report?
- What participant data does the agency collect and how does it use this data?
- Does the agency track whether participants use multiple services?
- Can the agency pull reports on how many participants are served by each individual program during a specific period?
- Does the agency have a system in place to track family, agency, and/or community outcomes?
- Does the agency track and compare data from multiple years to see trends in agency success, customer satisfaction, or other areas?
- Has the agency analyzed its outcomes in the past 12 months?
- Do the agency's Community Action Plan and Strategic Plan document the continuous use of the full ROMA cycle (assessment, planning, implementation, achievement of results, and evaluation)?
- Does the agency use the services of a ROMA-certified trainer to assist in implementation?

If the answer to any of these questions is "no", the eligible entity's CSBG monitoring report will include a finding and/or recommendation related to the question which will result in the eligible entity developing a Technical Assistance Plan within 60 days of the communication of the finding. DCF will also offer technical assistance to assist the eligible entity in improving its ability to use data to improve service delivery.

Furthermore, DCF requires that each eligible entity completes an annual CSBG application that includes a Community Action Plan. The Community Action Plan must include outcome goals for each program. Eligible entities are also required to complete mid-year and year-end reports that provide the program's results related to its outcome goals. If a program is failing to meet its goals, the eligible entity must provide information about the actions it is taking to improve the program's performance.

Community Action Plans and Needs Assessments

- 13.5.** Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act.

Note: this response will link to the corresponding assurance, item 14.11.

As stated in its CSBG Policy and Procedures Manual, DCF requires that all eligible entities have: “an annual Community Action Plan developed under the guidance of the agency’s board of directors, which provides a basis for directing and monitoring the agency’s efforts in addressing poverty-related problems in the community.”

The eligible entities must submit an annual application to DCF that includes a Community Action Plan outlining their plans for use of the CSBG funds. Completed applications with Community Action Plans are due to DCF by October 1 in the year prior to the contract year, which begins on January 1. DCF reviews and approves the applications prior to issuing contracts.

- 13.6. State Assurance:** Describe how the state will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity’s Community Action Plan, as required by Section 676(b)(11) of the CSBG Act.

Note: this response will link to the corresponding assurance, item 14.11.

As stated in DCF’s CSBG Policy and Procedures Manual, “every three years, all contract agencies are required to conduct and submit a Community Needs Assessment. The purpose is to identify the greatest unmet poverty-related needs and the gaps in services for low-income individuals and families in the community, and to ensure that the agency is directing and adjusting its services regularly in response to the changing needs in the community.

The Community Needs Assessment must contain the following components:

1. An analysis of information gathered directly from low-income individuals through methods such as surveys, focus groups, interviews, and/or community forums;
2. Information gathered from community partners including community based organizations, faith based organizations, public sector partners, law enforcement, and educational institutions; and
3. An analysis of the most recent U.S. Census Bureau data showing the incidence of poverty in the contract agency’s service area and how poverty affects different demographic groups in the community.”

In years when a Community Needs Assessment is conducted, each eligible entity must include a report on the findings of its Community Needs Assessment with its CSBG application and Community Action Plan. The next year in which Wisconsin’s eligible entities must conduct Community Needs Assessments is 2022, with the results due to DCF by October 1, 2022.

The most recent Community Needs Assessment was completed in 2019 and the eligible entities used this Needs Assessment as the basis for strategic planning, development of new initiatives, expanding partnerships, and coordinating programming. DCF reviews each of these Community Needs Assessments and the entities’ Community Action Plans to ensure a clear relationship between the results of the assessment and the corresponding plans of the eligible entities.

SECTION 14: CSBG Programmatic Assurances and Information Narrative (Section 676(b) of the CSBG Act)

14.1 Use of Funds Supporting Local Activities

CSBG Services

14.1a. 676(b)(1)(A): Describe how the state will assure “that funds made available through grant or allotment will be used –

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--
 - (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
 - (ii) to secure and retain meaningful employment;
 - (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
 - (iv) to make better use of available income;
 - (v) to obtain and maintain adequate housing and a suitable living environment;
 - (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
 - (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –
 - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

Programs carried out through the state’s network of eligible entities support activities designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals with the following goals:

- (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);

Examples of programs in this area include: Family Self-Sufficiency programs that help participants of the Section 8 housing program to obtain employment and increased wages;

transitional housing programs to help families prepare for self-sufficiency after being homeless; and small business development programs.

(ii) to secure and retain meaningful employment;

Examples of programs in this area include: Skills Enhancement Program, which helps low-income working people obtain skills training for career advancement and increased income and access to benefits; and zero-interest car loan programs to help low-income workers obtain reliable transportation to work.

(iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;

Examples of programs in this area include: Head Start, Early Head Start and other child development programs; GED and Adult Basic Education programs; and literacy initiatives for homeless families.

(iv) to make better use of available income;

Examples of programs in this area include: financial literacy education programs; free tax preparation services for low- and moderate-income households; budget counseling; and assistance in accessing mainstream benefits.

(v) to obtain and maintain adequate housing and a suitable living environment;

Examples of programs in this area include: transitional housing and homeless shelters; home ownership programs; design and development of affordable housing; housing rehabilitation and weatherization; and Section 8 housing.

(vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;

Examples of programs in this area include: energy assistance; emergency rental assistance; emergency shelters; domestic violence shelters and related services; and food pantries and other emergency food assistance.

(vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –

(I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and

(II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts.

Examples of programs in this area include: neighborhood-based initiatives that arrange regular meetings between residents of neighborhoods that have experienced frequent shootings and other violent crimes and local law enforcement; door-to-door canvassing of target neighborhoods to assess housing quality and other safety issues, with information provided to the local municipal government and other local partners in order to infuse challenged neighborhoods with a range of opportunities to improve safety, quality of life, housing, and employment opportunities for residents; and local Housing Coalitions that include representatives from law enforcement, probation, and parole in order to coordinate housing for people returning from incarceration. Through these types of initiatives, partnerships are formed, needs are discussed, solutions are developed and implemented, and best practices are

documented and shared with the general public and other communities and agencies as appropriate.

Needs of Youth

- 14.1b. 676(b)(1)(B)** Describe how the State will assure “that funds made available through grant or allotment will be used –
- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--
- (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
 - (ii) after-school child care programs;

DCF requires eligible entities to describe in their annual applications for CSBG funds how they provide and/or support efforts to address the needs of youth in low-income communities.

Wisconsin’s eligible entities operate approximately 25 programs that address the needs of youth in low-income communities. The following are some programmatic examples:

- Fresh Start, which provides education, hands-on construction training, and career direction focused on economic self-sufficiency for high-risk teens and young adults. The majority of youth served by Fresh Start programs are high school dropouts from low-income households. Common barriers they face include teen pregnancy/parenting, substance abuse issues, and contact with the juvenile and/or criminal justice system;
- Personal Responsibility Education Program (PREP), which is part of a multipronged federal strategy funded under the Affordable Care Act to reduce teenage pregnancies and sexually transmitted infections (STIs). PREP offers high quality, innovative teen pregnancy, and STI prevention services to at-risk youth;
- SDC operates several youth programs in Milwaukee, including a Gang Diversion Program for youth at risk of gang involvement and a Youth Advisory Board for teens ages 14 to 18;
- WIOA-funded youth employment programs; and
- CAP Services, Inc. has dedicated six beds in its Family Crisis Shelter for runaway and homeless youth.

Coordination of Other Programs

- 14.1c. 676(b)(1)(C)** Describe how the State will assure “that funds made available through grant or allotment will be used –
- (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts)

Through the CSBG monitoring process, the CSBG contract manager routinely ensures that there are strong collaborative relationships between eligible entities and other anti-poverty organizations in each community. These relationships serve to reduce duplication of efforts among local service providers and focus resources strategically on local communities’ most pressing needs.

The following are some examples of eligible entities’ activities in this area:

- Leading local Continuums of Care, which are the communitywide consortia of service providers and other stakeholders working together to address homelessness on the local level;
- Coordinating the food pantries that cover an eligible entity’s service area;
- Working with local workforce development boards to improve employment outcomes and training opportunities for low-income people;
- Working with the full spectrum of educational institutions via partnerships between Head Start and elementary schools; high schools through programs like Fresh Start, reproductive health and pregnancy prevention services; and post-secondary institutions with programs like Skills Enhancement, Fresh Start or other workforce training programs;
- Providing domestic abuse or sexual assault services through cooperative agreements with law enforcement, district attorneys, corrections, health providers, schools, and universities; and
- Partnering with county human service departments in a variety of ways in order to better serve mutual customers.

State Use of Discretionary Funds

- 14.2 676(b)(2)** Describe “how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.”

Note: the State describes this assurance under “State Use of Funds: Remainder/Discretionary,” items 7.9 and 7.10

[No response; links to items 7.9 and 7.10.]

Eligible Entity Service Delivery, Coordination, and Innovation

- 14.3. 676(b)(3)** “Based on information provided by eligible entities in the State, a description of...”

Eligible Entity Service Delivery System

- 14.3a. 676(b)(3)(A)** Describe “the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the State;”

The eligible entities operate a wide variety of services for low-income individuals and families including housing and homeless prevention; employment and training programs; medical and dental care; Head Start and child care centers; transportation assistance; emergency food programs; weatherization; energy assistance; and programs that promote family stability and positive parenting practices for both custodial and noncustodial parents. Referrals come to these programs through 2-1-1 call centers, other service providers in the community, and other programs within the eligible entities themselves. Many of the eligible entities also report receiving a significant portion of their referrals through word-of-mouth, when members of the community share information with one another about where to go for assistance.

Eligible Entity Linkages – Approach to Filling Service Gaps

- 14.3b. 676(b)(3)(B)** Describe “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and followup consultations.”

Note: the state describes this assurance in the State Linkages and Communication section, item 9.3b.

[No response; links to 9.3b.]

Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources

- 14.3c. 676(b)(3)(C)** Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources.

Note: the state describes this assurance in the State Linkages and Communication section, item 9.7.

[No response; links to 9.7.]

Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility

- 14.3d. 676(b)(3)(D)** Describe “how the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

Note: The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using State remainder/discretionary funds, allowable under Section 675C(b)(1)(F). In this State Plan, the state indicates funds allocated for these activities under item 7.9(f).

All eligible entities use a portion of their CSBG allocations to research and develop effective solutions to community needs. These solutions have included the creation of community health centers and clinics that provide affordable health and dental care to low-income people. They have also included the development of a significant number of new and rehabilitated housing units for low-income families and seniors.

Some of the state's eligible entities operate fatherhood programs. Two of these programs are linked with Head Start programs and focus on engaging the fathers of children enrolled in Head Start, and others are freestanding fatherhood programs that focus on improving employment outcomes for low-income fathers.

Some of the state's eligible entities operate programs to strengthen families using a two-generation approach.

Some of the state's eligible entities operates a program to strengthen families through improved birth outcomes, which involves both pre- and post-natal programming and services.

In FFYs 2022 and 2023, Wisconsin agencies will continue to operate programs such as these, generating successful solutions to community needs.

Eligible Entity Emergency Food and Nutrition Services

- 14.4. 676(b)(4)** Describe how the state will assure "that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals."

DCF requires eligible entities to indicate on their annual applications for CSBG funds how they provide and/or support efforts to provide emergency food and nutrition services.

In Wisconsin, 14 of the 16 CAAs and UMOS directly provide emergency food assistance, and those that do not operate their own programs regularly refer households to food pantries and meal sites as necessary and appropriate. These agencies distribute food that they obtain through the USDA's The Emergency Food Assistance Program (TEFAP), private in-kind and cash donations, food drives, and perishable food recovery from farms, restaurants, grocery stores, and other food industry partners. Wisconsin's eligible entities' mobilize thousands of volunteers across the state each year to assist in feeding the hungry.

In addition, WISCAP staff work closely with Wisconsin's administrator of TEFAP. When issues arise related to agency responsiveness to problems (such as issues with food storage, attendance at coordinating meetings, staffing problems, or other issues) WISCAP staff works with the grantees to help ensure that the funded agencies address the identified issues. The

TEFAP administrator also meets with the eligible entities that operate emergency food programs at WISCAP board meetings once or twice per year.

Three eligible entities also operate Women, Infants & Children Nutrition (WIC) programs.

State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities

- 14.5. 676(b)(5)** Describe how the state will assure “that the State and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

Note: The state describes this assurance in the State Linkages and Communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

[No response; links to items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b]

State Coordination/Linkages: Low-income Home Energy Assistance

- 14.6. 676(b)(6)** Provide “an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community.”

Note: The state describes this assurance in the State Linkages and Communication section, items 9.2 and 9.5.

[No response; links to 9.2 and 9.5]

Federal Investigations

- 14.7. 676(b)(7)** Provide “an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.”

Note: the state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.

[No response; links to 10.13]

Funding Reduction or Termination

- 14.8. 676(b)(8)** Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below

the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b)."

Note: the state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.

[No response; links to 10.7]

Coordination with Faith-based Organizations, Charitable Groups, Community Organizations

- 14.9. 676(b)(9)** Describe how the state will assure "that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations."

Note: the state describes this assurance in the State Linkages and Communication section, item 9.6.

[No response; links to 9.6]

Eligible Entity Tripartite Board Representation

- 14.10. 676(b)(10)** Describe how "the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation."

Note: the state describes this assurance in the Eligible Entity Tripartite Board section, 11.3

[No response; links to item 11.3]

Eligible Entity Community Action Plans and Community Needs Assessments

- 14.11. 676(b)(11)** Provide "an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs."

[No response; links to items 13.5 and 13.6]

State and Eligible Entity Performance Measurement: ROMA or Alternate system

- 14.12. 676(b)(12)** Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

Note: The state describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.

[No response; links to 13.1, 13.2, 13.3, and 13.4]

Validation for CSBG Eligible Entity Programmatic Narrative Sections

- 14.13. 676(b)(13)** Provide “information describing how the State will carry out the assurances described in this section.”

Note: The state provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in section 14.

[No response for this item]

- ☒ By checking this box, the state CSBG authorized official is certifying the assurances set out above.

SECTION 15: Federal Certifications

The box after each certification must be checked by the State CSBG authorized official.

15.1. Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

☒ By checking this box, the State CSBG authorized official is providing the certification set out above.

15.2 Drug-Free Workplace Requirements

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645 (a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

- (1) By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
- (2) The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
- (3) For grantees other than individuals, Alternate I applies.
- (4) For grantees who are individuals, Alternate II applies.
- (5) Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
- (6) Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).
- (7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
- (8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through

1308.15);

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about --
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

☐ Check if there are workplaces on file that are not identified here. Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

☒ By checking this box, the state CSBG authorized official is providing the certification set out above.

15.3 Debarment

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

*Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -
Primary Covered Transactions*

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

*Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -
Primary Covered Transactions*

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
 - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
 - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
 - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was

- (3) placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (4) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (7) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

☒ By checking this box, the State CSBG authorized official is providing the certification set out above.

15.4 Environmental Tobacco Smoke

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

☒ By checking this box, the State CSBG authorized official is providing the certification set out above.



Tony Evers

Office of the Governor | State of Wisconsin

August 29, 2019

Seth Hassett, Director
U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of Community Assistance
Community Services Block Grant Program
330 C Street, S.W.
5th Floor/Mailroom 5425
Washington, D.C. 20201

Dear Mr. Hassett,

I hereby designate the Wisconsin Department of Children and Families as the single state agency responsible for administering the Community Services Block Grant (CSBG) and responsible for complying with all certification and assurances required by CSBG.

I hereby delegate authority to sign agreement and assurances to Department Secretary Emilie Amundson. At Secretary Amundson's direction, the Department Deputy Secretary is designated as the primary signatory authority. In the event the Deputy Secretary is unavailable, the Department Division of Family and Economic Services Administrator is the delegated alternate signature authority. All award letters are to be sent directly to:

The Wisconsin Department of Children and Families
201 East Washington Avenue, Second Floor
P.O. Box 8916
Madison, WI 53708-8916

We look forward to continuing to work with you on this important grant.

Sincerely,

A handwritten signature in cursive script that reads "Tony Evers".

Governor Tony Evers
State of Wisconsin



Wisconsin Department of Children and Families

OPEN MEETING NOTICE

For Public Review and Comment on the
**Wisconsin State Application and Plan for the Administration of the
Community Services Block Grant (CSBG) Program for
Federal Fiscal Years (FFYs) 2022-2023**

Monday, August 30, 2021
11:00 a.m. to 12:00 p.m.

Virtually via Zoom:

<https://dcfwi.zoom.us/j/89249518077?pwd=UE1sRTAxc2lwN3lITINJajM1dEJYZz09>

Meeting ID: 892 4951 8077

Passcode: 484809

Join by Telephone:

+1 470 250 9358 US (Atlanta)

Meeting ID: 892 4951 8077

Passcode: 484809

Find your local number: <https://dcfwi.zoom.us/j/89249518077?pwd=UE1sRTAxc2lwN3lITINJajM1dEJYZz09>

Join by SIP:

89249518077@zoomcrc.com

Join by H.323:

162.255.37.11 (US West)

162.255.36.11 (US East)

Meeting ID: 892 4951 8077

Passcode: 484809

- I. Welcome and Introductions
- II. Brief Overview of the Community Services Block Grant (CSBG) and the CSBG State Plan
- III. Public Comment

Interested parties may attend or participate by one of the options listed above, and using the Meeting ID and Passcode. Please contact Anna Sainsbury at anna.sainsbury@wisconsin.gov or 608.422.6270 if other accommodations are needed.

The draft CSBG State Plan is available for review at: <http://dcf.wisconsin.gov/CSBG>.



Written comments on the CSBG State Plan may be sent on or before August 30, 2021 to the contact person:

Anna Sainsbury, Bureau of Working Families Contract Manager
Wisconsin Department of Children and Families
201 W. Washington Avenue, PO Box 8916
Madison, WI 53708-8916

Or by email to: anna.sainsbury@wisconsin.gov

cc: Wisconsin's Community Action Agencies and Limited Purpose Agencies
Wisconsin Community Action Program Association (WISCAP)
Legislature and administrative offices in the Wisconsin State Capitol
Wisconsin Department of Health Services
Wisconsin Department of Workforce Development
Wisconsin Department of Administration
Wisconsin State Journal
Wisconsin Head Start Collaboration Office
Wisconsin Head Start Association
Wisconsin Department of Children and Families, Bureau of Regional Operations



Wisconsin Department of Children and Families

Community Services Block Grant (CSBG) Monitoring Tool for ***Agency Name***

Date(s) of Visit

General Information	
Number of employees	
Revenue for current year (anticipated)	\$
CSBG allocation for current year	\$
CSBG CARES Act allocation	\$
Counties served	
List and location of program sites	
Location(s) for monitoring visit	
Driving, parking, and/or arrival instructions	

Monitoring Process Checklist

Task	Target Date for Completion	Date Completed
Pre-Monitoring Tasks		
Dates are selected for the agency's onsite review		
Pre-Monitoring Materials Request Memo sent to agency executive director including Board Roster Form to be returned within one week		
Board Roster Form returned by agency		
Board Surveys sent out and requested to be returned within two weeks. (DCF may not conduct a board survey for every monitoring visit.)		
Board Surveys returned by the majority of members		
Materials listed in the Pre-Monitoring Materials Request Memo returned by the agency		
Pre-Monitoring Document Checklist completed		
Contract Compliance Checklist completed		
Pre-Monitoring Desk Review completed		
Analysis of Board Survey Results completed		
Monitoring Visit Schedule finalized and confirmed with agency		
Monitoring Tasks		
Onsite Monitoring Visit completed		
If not done while onsite, Exit Interview scheduled/completed (DCF may elect to complete this telephonically after the onsite visit)		
Post-Monitoring Tasks		
CSBG Organizational Standards Assessment completed (at end of monitoring tool)		
Monitoring Report completed and sent to the agency within 30 days of the completed exit interview		
Send Monitoring Report to DCF Auditors (DCFAuditors@wisconsin.gov) so the agency's risk assessment can be updated		
Monitoring Report signed by board chair and executive director received from agency within 60 days of report		
Agency's Corrective Action Plan (if applicable) received by DCF within 60 days of report date		
DCF acceptance and/or response to the Corrective Action Plan sent to agency within 30 days of receipt		
Schedule Corrective Action Plan due dates/timelines and required follow-ups (if applicable)		

Pre-Monitoring Document Checklist

Document Type	To Be Provided By	Received?	Follow-up Notes
Civil Rights Compliance Letter of Assurance (CRC LOA)	Equal Opportunity Specialist: Beverly.Jenkins@wisconsin.gov	<input type="checkbox"/>	
Affirmative Action Plan (not required if less than 50 employees)	Finance Bureau Contract Specialist: CraigT.Jeranek@wisconsin.gov	<input type="checkbox"/>	
Financial Statements/Audits for last 3 years	CSBG Contract Manager to pull from PATS	<input type="checkbox"/>	
Monitoring Tool (blank)	CSBG Contract Manager to send to agency with Pre-Monitoring Memo	<input type="checkbox"/>	
Bylaws	Agency	<input type="checkbox"/>	
Personnel policies	Agency	<input type="checkbox"/>	
Board orientation manual (including COI policy)	Agency	<input type="checkbox"/>	
Agency organizational chart	Agency	<input type="checkbox"/>	
Financial policies/procedures	Agency	<input type="checkbox"/>	
Strategic Plan	Agency	<input type="checkbox"/>	
Succession Plan	Agency	<input type="checkbox"/>	
List of entities that the agency subcontracts with, if applicable	Agency	<input type="checkbox"/>	
Schedule of current year's board meetings	Agency	<input type="checkbox"/>	
List of other federal programs that the agencies provides services (HUD, Head Start, etc.)	Agency	<input type="checkbox"/>	
Board meeting minutes up-to-date	Agency	<input type="checkbox"/>	
CSBG/CARES Funded Programs form	Agency	<input type="checkbox"/>	
List of CSBG/CARES funded positions	Agency	<input type="checkbox"/>	
Board Roster form	Agency	<input type="checkbox"/>	
Board Survey mailed/emailed to Board roster	CSBG Contract Manager	<input type="checkbox"/>	
IRS Form 990	CSBG Contract Manager to pull from Guidestar website (requires a free account)	<input type="checkbox"/>	
Current cost allocation plan	CSBG Contractor (should be submitted through SPARC)	<input type="checkbox"/>	
Current Federal Indirect Cost Rate Agreement	CSBG Contractor (should be submitted through SPARC)	<input type="checkbox"/>	
Worksheet for Pre-Monitoring Fiscal Review	CSBG Contract Manager	<input type="checkbox"/>	
Contract Compliance Checklist and Pre-Monitoring Desk Review (in tool)	CSBG Contract Manager	<input type="checkbox"/>	
List of materials to review on-site (in tool – provide at opening meeting)	CSBG Contract Manager	<input type="checkbox"/>	

Contract Compliance Checklist

Requirement	Compliant?	Notes
Annual Single Audit Reporting Package submitted to DCFAuditors@wisconsin.gov within 180 days of the end of the Contractor's fiscal year (<i>Org. Standard 8.1, 8.2 and DCF CSBG Contract</i>)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Were there any audit findings, deficiencies, and/or weaknesses? If so, have all issues been addressed?</i>
Affirmative Action Plan submitted to DOA within 15 working days of signing the contract, unless exceptions noted (<i>DCF CSBG Contract</i>)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>E.g., not required if less than 50 employees</i>
Civil Rights Compliance Letter of Assurance (CRC LOA) submitted to DCF Civil Rights Unit within 15 working days of signing the contract, and updated in the event of changes to key personnel identified in the LOA (<i>DCF CSBG Contract</i>)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Board minutes (<i>DCF CSBG Contract</i>)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Any months missing through current? Any committee meeting minutes needed?</i>
CSBG Annual Report, Modules 2,3, and 4; CARES Modules 2 and 4 (<i>Org. Standard 9.4</i>)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Cost Allocation Plan submitted through the SPARC online portal within 30 days of signing the contract (and resubmitted when material updates are made to the plan) (<i>DCF CSBG Contract</i>)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Federal Indirect Cost Rate Agreement submitted through the SPARC online portal within 30 days of signing the contract (and resubmitted when new agreements are made) (<i>DCF CSBG Contract</i>)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Agency's corporate status up-to-date on the WI Department of Financial Institutions website	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Pre-Monitoring Desk Review

GOVERNANCE	Item Reviewed	Review Notes
	Board roster	<p>Tripartite structure (<i>Org. Standard 5.1</i>) <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Number of board members: _____ (<i>DCF Contract and WI State Statute stipulate 15 to 51</i>)</p> <p>Number required by agency's bylaws: _____</p> <p>Is the number of members in alignment with bylaws? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Have any seats been open for longer than allowed by bylaws? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Notes:</p>
	Bylaws	<p>Date of last review by the board: _____</p> <p>Date of last review by an attorney: _____</p> <p>Were the bylaws reviewed by an attorney within the last five years? (<i>Org. Standard 5.3</i>) <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Meeting frequency: _____</p> <p>Number for a quorum: _____</p> <p>Do the bylaws define the following?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Tripartite board composition (<i>CSBG Act, Org. Standard 5.1</i>) <input type="checkbox"/> Democratic selection of low-income board members (<i>CSBG Act, Org. Standard 5.2</i>) <input type="checkbox"/> How board members are recruited and seated <input type="checkbox"/> How the board elects public official board members vs. setting aside seats for specific public positions (<i>best practice</i>) <input type="checkbox"/> Public officials or their representatives serve only while the official is in office or his/her appointed position (<i>OCS IM 82 recommendation</i>) <input type="checkbox"/> Meeting frequency and board quorum defined <input type="checkbox"/> Number of board members defined <input type="checkbox"/> Procedures for removing board members for nonattendance <input type="checkbox"/> Procedure for filling vacancies <input type="checkbox"/> Board responsibilities <input type="checkbox"/> Committees and their authority <input type="checkbox"/> Separate finance and personnel committees (<i>best practice</i>) <input type="checkbox"/> Officers and their duties <p>Notes:</p>

GOVERNANCE	Board minutes and schedule of meetings	<p>How many times has the board met in the past 12 months? _____</p> <p>How many in the past 12 months had a quorum? _____</p> <p>Did the frequency of board meetings meet the frequency called for in the bylaws? (<i>Org. Standard 5.5</i>) <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Is attendance of board members compliant with bylaws? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Notes:</p>
	Board manual & board member conflicts of interest	<p>Is the board orientation manual aligned with the agency's bylaws and CSBG requirements? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Is there a policy in place requiring board members to sign a Conflict of Interest agreement at least every two years? <input type="checkbox"/> Yes <input type="checkbox"/> No (<i>Org. Standard 5.6</i>)</p> <p>Has evidence been provided by the agency that all board members have signed a Conflict of Interest form within the last two years (either through the pre-monitoring or previous desk auditing processes)? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p style="padding-left: 40px;"><i>If "No," Contract Manager will request to see these signed forms during the onsite visit – add to list of materials requested at opening meeting.</i></p> <p>Notes:</p>

HUMAN RESOURCES	Item Reviewed	Review Notes
	Org chart	Notes and/or follow-up questions for human resources manager:
	Succession plan	<p>Does the succession plan have the following elements:</p> <p><input type="checkbox"/> Approved by the board</p> <p><input type="checkbox"/> Covers an emergency/short-term absence of three months or less</p> <p><input type="checkbox"/> Outlines the process for filling a permanent vacancy</p> <p>(<i>Org. Standard 4.5</i>)</p> <p>Notes:</p>

HUMAN RESOURCES	Personnel policies & staff conflicts of interest	Date of last review by the board: _____ Date of last review by an attorney: _____ Were the personnel policies reviewed by an attorney and approved by the board within the last five years? (Org. Standard 7.1) <input type="checkbox"/> Yes <input type="checkbox"/> No Do the personnel policies include the following? <input type="checkbox"/> Explanation of fringe benefits, including leave and holidays <input type="checkbox"/> Written discipline and termination policies <input type="checkbox"/> Whistleblower/anti-retaliation (Org. Standard 7.7) <input type="checkbox"/> Travel policy <input type="checkbox"/> Non-discrimination statement <input type="checkbox"/> Conflict of interest statement for staff <input type="checkbox"/> Nepotism statement <input type="checkbox"/> Definition of work day, work week, and hours <input type="checkbox"/> Overtime rules – overtime must have proper approval <input type="checkbox"/> Policy requiring all staff driving on company business to have a current driver's license Is there a policy in place requiring staff to sign the conflict of interest statement at least every two years? <input type="checkbox"/> Yes <input type="checkbox"/> No If no, what is the process for having staff sign conflict of interest statements, and how often is it completed? Notes:

FISCAL	Item Reviewed	Review Notes
	IRS Form 990	Is the agency up-to-date in terms of filing the Form 990? <input type="checkbox"/> Yes <input type="checkbox"/> No What year is the most recent Form 990 for? _____ Do board minutes record board approval of the Form 990? (Org. Standard 8.6) <input type="checkbox"/> Yes <input type="checkbox"/> No Does the agency engage in lobbying activities? <input type="checkbox"/> Yes <input type="checkbox"/> No Are any legislative lobbying activities noted on the Form 990? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A If yes, did the agency elect 501(h) and/or provide specific information? <input type="checkbox"/> Yes <input type="checkbox"/> No Do pages 1 and 9-12 of the Form 990 approximately match the financial statement in the agency's corresponding audit? <input type="checkbox"/> Yes <input type="checkbox"/> No Notes:

FISCAL	Item Reviewed	Review Notes			
	Audits & financial statements	This table to be populated using the <i>Worksheet for Pre-Monitoring Fiscal Review</i>			
		Last 3 Years:	20__	20__	20__
		Current ratio			
Available cash on hand					
	Grants receivable as a % of annual grant revenue				
	<i>Notes:</i>				
	General ledger & expense reports from 2 non-consecutive months	Are the expense reports supported by the general ledger? <input type="checkbox"/> Yes <input type="checkbox"/> No Are CSBG costs allowable? (CSBG Act and OMB Circular) <input type="checkbox"/> Yes <input type="checkbox"/> No Are any costs classified as “miscellaneous” or not defined? <input type="checkbox"/> Yes <input type="checkbox"/> No Four specific cost items selected for review during the onsite visit:			
Item #		Date	Description		
	<i>Contract Manager will request to see the supporting documentation for these cost items during the onsite visit – add to list of materials requested at opening meeting.</i> <i>Notes:</i>				
	Fiscal policies, procedures, & cost allocation plan	Date the agency’s fiscal policies & procedures were last reviewed by staff: _____ had changes approved by board: _____ Was this review within the past two years? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(Org. Standard 8.10)</i> Date the agency’s written procurement policy was last reviewed by the board: _____ Was this review in the last five years? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(Org. Standard 8.11)</i> Does the agency have an indirect cost rate or use direct cost allocation? <input type="checkbox"/> Indirect cost rate <input type="checkbox"/> Direct cost allocation If no approved indirect cost rate is in place, does the agency have a written cost allocation plan? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(Org. Standard 8.12)</i> Does the general ledger show evidence that the agency follows its cost allocation plan? <input type="checkbox"/> Yes <input type="checkbox"/> No Are internal controls outlined in the agency’s fiscal policies? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Notes:</i>			

ATTACHMENT 3: CSBG Monitoring Tool

CSBG subcontracts	<p>Does the agency subcontract any CSBG funds? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, did the agency have prior written approval from DCF as required by the DCF contract? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>Notes:</i></p>

PROGRAMS AND MANAGEMENT	<i>Item Reviewed</i>	<i>Review Notes</i>
	Strategic plan	<p>Does the agency have a current strategic plan? <input type="checkbox"/> Yes <input type="checkbox"/> No (Org. Standard 6.1)</p> <p>What years does the most recent strategic plan cover? _____</p> <p>Does the plan address reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient? (Org. Standard 6.2) <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Does the plan contain family, agency, and/or community goals? <input type="checkbox"/> Yes <input type="checkbox"/> No (Org. Standard 6.3)</p> <p><i>Notes:</i></p>
	List of CSBG funded programs	<p>Programs selected for participant file and supporting documentation review:</p> <ol style="list-style-type: none"> 1. 2. 3. 4. <p>Does the agency participate in the Skills Enhancement Program (SEP)? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>The Contract Manager will review a sampling of participant files from 1-4 programs while onsite. If the agency participates in the SEP, the Contract Manager will include monitoring for that program during the visit.</i></p> <p><i>Notes:</i></p>
	List of federal programs	<p><i>Notes:</i></p>

ATTACHMENT 3: CSBG Monitoring Tool

PROGRAMS AND MANAGEMENT	List of CSBG funded positions	Positions selected for HR file review: <ol style="list-style-type: none"> 1. 2. 3. <i>The Contract Manager will review the HR files for 3 CSBG-funded staff members while onsite.</i> <p>Notes:</p>
	CSBG Annual Report Modules 2, 3, and 4	Is the agency compliant/current with its CSBG Annual Report submissions (Modules 2, 3, 4)? <input type="checkbox"/> Yes <input type="checkbox"/> No Most recent Annual Report year completed: _____ Documentation to support origins of data reported in the Modules to request when onsite (if any): <ol style="list-style-type: none"> 1. 2. 3. 4. <p>Notes:</p>

Analysis of Board Survey Results

Source Data	
Current Number of Board Members	
Number of Surveys Emailed	
Number of Surveys Mailed	
Requested Return Date	Click or tap to enter a date.
Number of Surveys Returned	
Response Rate %	

Analysis	
Positives	<i>Notes:</i>
Negatives	<i>Notes:</i>
T/TA Requests	<i>Notes:</i>
Additional Comments	<i>Notes:</i>

Draft Monitoring Visit Schedule

Agency Name <i>Dates of Monitoring Visit</i>		
Section	Activity	Time
Day 1		
1	Introductions with executive director and management team; tour of facility	8:30 to 9:30 am
2	Governance (board materials) review	9:30 to 10:00 am
3	Interview with board chair, other board members, and executive director (as available)	10:00 to 11:00 am
4	HR file reviews for CSBG funded positions selected by Contract Manager	11:00 to 11:30 am
5	Interview with the HR manager	11:30 am to 12:00 pm
<i>Lunch Break – 12:00 to 1:00 pm</i>		
6	Fiscal review of specific items and supporting documentation from the general ledger selected by Contract Manager	1:00 to 1:45 pm
7	Interview with the chief financial officer and follow-up from pre-monitoring review of fiscal materials	1:45 to 2:30 pm
8	CSBG Annual Report data review and process discussion	2:30 to 3:00 pm
9	CSBG-specific interviews on program evaluation, ROMA, and Community Needs Assessments	3:00 to 3:45 pm
	Wrap-up for Day 1	3:45 to 4:00 pm
Day 2		
11	Participant file reviews from specific CSBG funded programs selected by Contract Manager (will include Skills Enhancement Program, if applicable)	8:30 to 10:00 am
10	Management interview with executive director and program managers (as available)	10:00 to 10:45 am
12	Exit interview prep and site visit wrap-up with executive director and any key staff (as requested by Contract Manager)	10:45 to 11:15 am
13	Exit Interview (onsite or TBD via telephone, at Contract Manager's discretion)	11:15 am to 12:00 pm

**If the agency has multiple sites, the Contract Manager may work with the agency to schedule time to tour the other locations, during the afternoon before Day 1 or before the exit interview on Day 2.*

1. Introductions with Executive Director and Management Team

The meeting agenda will include: introductions, tour of facility, an overview of the guiding principles for CSBG monitoring (mutual respect, open communication, joint problem solving), a review of the schedule for the monitoring visit, and a summary of the contract manager's initial impressions from the pre-monitoring desk review.

The contract manager will also request materials at this time for onsite review:

List of Materials to Review Onsite	
Participant files from 1-4 CSBG and CSBG CARES-funded programs (include SEP, if agency participates)	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
HR files for 3 CSBG/CSBG CARES-funded staff members	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Board manual, if not previously provided	<input type="checkbox"/>
Board members' signed Conflict of Interest (COI) agreements	<input type="checkbox"/>
Expense report and supporting documentation for specific CSBG and CSBG CARES cost items selected during pre-monitoring fiscal review of the general ledger	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
CSBG and CSBG CARES Annual Report origins of data supporting documentation	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Misc. review requests or materials not provided during pre-monitoring	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

2. Governance (Board Materials) Review

- **Board orientation manual/materials** - *If this could not be sent by email for the pre-monitoring desk review, the contract manager will review this onsite and complete the questions on page 4 at this time.*
- **Evidence that board members receive copies of the bylaws every two years is observed by the contract manager (Org. Standard 5.4)** ☐ Yes ☐ No
- **Copies of signed conflict of interest statements in board member files within the past two years are observed by the contract manager (Org. Standard 5.6)** ☐ Yes ☐ No

3. Governance Interview with the Board Chair (other Board Members who are available and Executive Director optional)

Interview Attendees	
Board Chair	
Board Members	
Executive Director	
Others from Agency	
DCF Representative(s)	

- a. Have there been any updates to the list of board vacancies provided on the Board Roster during the pre-monitoring phase? ☐ Yes ☐ No

Notes:

- b. Is a structured orientation provided for new board members within 6 months of being seated? (Org. Standard 5.7) ☐ Yes ☐ No

- c. Does the board have a fiscal expert? ☐ Yes ☐ No

If yes, what are his or her qualifications?

- d. Does the board include an attorney? ☐ Yes ☐ No

If no, how does the agency obtain legal advice?

- e. Who leads the board meetings?

- f. How is board training provided? (Org. Standard 5.8 states that board members should have received some type of training within the last two years.)

- g. When was the last time the board received ROMA training?

- Who provided the most recent ROMA training?

- h. Are the elected or appointed officials active? ☐ Yes ☐ No

- If a public official sends a representative, is there a process set through which the representative keeps the official abreast of the agency's work? ☐ Yes ☐ No

- i. Do board members sign a conflict of interest agreement and does the board review this document every two to three years? ☐ Yes ☐ No

- j. Is there a democratic process for selecting representatives of the low-income community?

☐ Yes ☐ No

- If yes, what is the process?

- k. What policies are in place to ensure that low-income individuals, community organizations, religious organizations, or representatives of low-income organizations can petition for representation on the board?

- l. In general, is the ethnic/racial/cultural make-up of the board representative of the community, including the low-income communities the agency serves? ☐ Yes ☐ No

Notes:

- m. Do any board members who represent a particular neighborhood or low-income area reside in the area they represent? ☐ Yes ☐ No

- n. Has the board adopted a code of ethics or code of conduct? ☐ Yes ☐ No

- o. Is the mission statement in the agency's Board Manual? ☐ Yes ☐ No

- Does the mission statement address poverty? ☐ Yes ☐ No
- Has the board reviewed it in the past five years? ☐ Yes ☐ No
- Has the board reviewed all programs and services in the past five years to determine if they are in alignment with the mission? (Org. Standard 4.1) ☐ Yes ☐ No

- p. Does the board approve the agency's annual budget? (Org. Standard 8.9) ☐ Yes ☐ No

- q. Does the board receive financial reports at each meeting including Revenue and Expenditures reports that compare budget to actual for each program, and a balance sheet/statement of financial position? (Org. Standard 8.7) ☐ Yes ☐ No

If yes, who presents the financial reports?

Notes:

- r. Does the Board have a Finance Committee? ☐ Yes ☐ No

- If yes, how many members?
- How often does it meet?
- Are minutes of the Finance Committee meetings provided to the board?
☐ Yes ☐ No
- What items are routinely covered by the Finance Committee?

- s. Does the board have committees structured to fully address its fiduciary and governance responsibilities? ☐ Yes ☐ No

- t. From your perspective, what are the agency's strengths and challenges?

- u. What are the current board's strengths and challenges?
- v. How does the agency's board fulfill its role of setting annual and long range goals?
- w. Does the board receive briefings on and/or copies of agency reviews or evaluations produced for governmental or other funding sources? ☐ Yes ☐ No
- x. What are the most significant contributions that board members have made to the success of the agency in the past three years?
- y. What issues are the standing committees currently addressing?
- z. What information do you receive about program activities, performance, and service outcomes? What format/forums and how often? (*Org. Standard 5.9*)
- aa. Does the board undertake any type of self-evaluation? ☐ Yes ☐ No
 - If yes, how and when?
- bb. What is the process for identifying and recruiting new board members?
- cc. How effectively has the board been able to maintain its tripartite balance, and what challenges does the board face maintaining that balance?
- dd. When did the board last revise its bylaws?
 - Are revisions needed to the current bylaws, and if so, is there a process and timeline to accomplish that in the current year?
- ee. What is the executive director evaluation process and what is the board's role in it?

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- ff. Is the evaluation process performed annually? (*Org. Standard 7.4*) ☐ Yes ☐ No
- gg. Does the board review and approve the executive director's compensation as part of this process? (*Org. Standard 7.5*) ☐ Yes ☐ No
- If no, what is the process and frequency for reviewing the executive director's compensation?
- hh. Is there any training or technical assistance that you feel would benefit the board?

4. Human Resources Onsite Material Review

HR files for 3 CSBG-funded staff members			
Staff Name:			
% of salary CSBG-funded			
Job description in file? (Org. Standard 7.3)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Job description updated in last 5 years? (Org. Standard 7.3)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
COIs and signed staff agreements in file?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Regular written performance evaluations are observed (Org. Standard 7.6)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Notes:

5. Interview with Human Resources Manager

Interview Attendees	
Human Resources Manager	
Executive Director	
Others from Agency	
DCF Representative(s)	

- a. Follow-up questions on the succession plan as noted on page 5.
- b. Follow-up questions on the organizational chart as noted on page 5.
- c. In addition to salary, what benefits does the agency provide staff?
- d. Have staff funded by CSBG (25% or more) participated in any trainings or conferences in the past two years? ☐ Yes ☐ No
 - Do CSBG funded staff generally attend WISCAP events? ☐ Yes ☐ No
- e. Have there been any vacancies in CSBG funded positions in the past 12 months? ☐ Yes ☐ No
 - If yes, what position(s) and for how long?
- f. How do staff members make training needs known to the agency?
 - Is there any training or technical assistance that would be beneficial to staff or volunteer development in helping them achieve successful outcomes for participants and the agency?
- g. How are ethical standards (for staff conduct, including interaction with participants) communicated and enforced?
- h. What challenges (if any) do you encounter in recruiting and retaining qualified staff?
- i. Has the agency conducted salary surveys within the past two years? ☐ Yes ☐ No

- If yes, does the agency:
 - ☐ conduct these surveys independently
 - ☐ use a consultant/broker
 - ☐ use WISCAP's salary survey
- j. Has the agency been able to support COLA increases for all employees over the last three years? ☐ Yes ☐ No
 - If no, why not?
- k. Does the agency expect COLA increases this year? ☐ Yes ☐ No
- l. Are merit-based increases or bonuses available to employees? ☐ Yes ☐ No
- m. Are any relatives of current senior management or board members employed by the agency?
☐ Yes ☐ No
 - If yes, what are the relationships?
- If yes, were conflict of interest policies followed? ☐ Yes ☐ No
- n. Have any employees received assistance under any of the agency's programs in the last three years? ☐ Yes ☐ No
 - If yes, were conflict of interest policies followed? ☐ Yes ☐ No
- o. Are all employees classified as either exempt or nonexempt? ☐ Yes ☐ No
- p. Is employee information kept in a locked, secure, non-public location? ☐ Yes ☐ No
- q. How does the agency ensure that personnel policies are available to all staff and that staff are notified of changes? (*Org. Standard 7.2*)
- r. Do all staff participate in a new employee orientation within 60 days of hire? (*Org. Standard 7.8*) ☐ Yes ☐ No

6. Fiscal Onsite Review of Specific Cost Items

Cost item	Date of expense	Amount	Documentation observed by the contract manager

Notes:

7. Interview with the Chief Financial Officer

Interview Attendees	
CFO or equivalent	
Executive Director	
Others from Agency	
DCF Representative(s)	

- a. Does the organization engage in any lobbying, which would include having staff or volunteers meet with, call, or email elected officials regarding state or federal legislation, including appropriations, or referenda or ballot initiatives? (*Definition of lobbying from CAPLAW's "Lobbying Q & A", Spring 2011*) ☐ Yes ☐ No
- If yes, what policies and procedures are in place to ensure that only non-federal unrestricted funds are used to pay for lobbying expenses?
- b. What policies and procedures does the organization have in place to ensure that no CSBG programs are affiliated or identified with, or use any CSBG funds to support the following:
- Partisan or non-partisan political activity, or any political activity associated with a candidate, or contending faction or group, in an election for public or party office;
 - Voter registration activities; or
 - Providing voters with transportation to the polls or similar assistance? (*CSBG Act*)
- c. Are procedures in place to ensure that CSBG funds are not used to purchase, construct, or improve (other than low-cost residential weatherization or other energy-related home repairs) any building or facility, unless a waiver is received from OCS? (*CSBG Act*) ☐ Yes ☐ No
- d. Has an agency-wide risk assessment been completed within the past two years? (*Org. Standard 4.6*) ☐ Yes ☐ No
- If yes, date of last risk assessment:
 - How was the risk assessment completed (self, consultant, other)?
 - If yes, was it reviewed by the board? ☐ Yes ☐ No
- e. Does the agency have a written record retention policy in place? (*Org. Standard 8.13*) ☐ Yes ☐ No
- If yes, what is the policy?

- f. Are all agency computers password protected? ☐ Yes ☐ No
- What back-up does the agency have for data and electronic systems?
 - Is there a disaster recovery plan in place? ☐ Yes ☐ No
- g. Describe the payroll process, including who is involved in the approval process, and which pieces, if any, are outsourced.
- h. Bank Reconciliations: describe the reconciliation process.
- Does one person perform the reconciliation and another sign off on it? ☐ Yes ☐ No
 - Does the agency perform these at least quarterly? ☐ Yes ☐ No
- i. Has the agency solicited bids for its audit within the past five years? (*Org. Standard 8.5*)
☐ Yes ☐ No
- j. Are all required filings and payments related to payroll withholdings completed on time? (*Org. Standard 8.8*) ☐ Yes ☐ No
- k. Does the agency's auditor present the audit to the board or a committee of the board? (*Org. Standard 8.3*) ☐ Yes ☐ No
- l. Does the board formally receive and accept the audit? (*Org. Standard 8.4*) ☐ Yes ☐ No
- m. Does the finance committee analyze expenditure reports and provide a report to the board?
☐ Yes ☐ No
- n. How are exceeded budgets dealt with (or budgets that are projected to be exceeded)?
- o. How are costs allocated to programs?
- p. How many bank accounts does the agency have?
- q. Who has access to the bank accounts?
- r. Does the finance committee receive regular reports on the status of the accounts? ☐ Yes ☐ No
- s. Is there a periodic review of financial operation of the agency? ☐ Yes ☐ No
- t. Does the finance committee play a role in the development of agency fiscal policies? ☐ Yes ☐ No

8. Programs and Management Onsite Material Review

The contract manager will discuss the agency's CSBG and CSBG CARES Annual Report process and how data for Modules 2, 3, and 4 are compiled. The agency will explain any complications in reporting this data from year-to-year, and will walk the contract manager through an example of how specific outcomes are reported for the National Performance Indicators (NPIs). The contract manager may request supporting documentation for specific data from the agency's most recent CSBG and CSBG CARES Annual Report submissions, including origins of data reported in Modules 2, 3, or 4.

Data point	Supporting documentation observed by the contract manager

Notes:

9. CSBG-Specific Interviews on Program Evaluation, ROMA, and Community Needs Assessments

Interview Attendees	
CSBG-specific planner, manager or equivalent	
Executive Director	
Others from Agency	
DCF Representative(s)	

- a. Are all agency programs tied to at least one ROMA objective (NPI)? ☐ Yes ☐ No
- b. Does the agency conduct or make available staff development/training, including ROMA, on an ongoing basis? (*Org. Standard 7.9*) ☐ Yes ☐ No
 - If yes, who provides it and how often is it done?
- c. In addition to service on the board and its committees, how does the agency use volunteers to support goals and outcomes in CSBG programs?
- d. How is volunteer data tracked for reporting in Module 2? (*Org. Standard 2.4*)
- e. How is board and staff capacity building (training, planning, assessment) tracked for reporting in Module 2?
- f. Does the agency have an agency wide database for tracking participant data? ☐ Yes ☐ No
 - If not, how is the agency able to obtain an unduplicated count of its participants for the CSBG Annual Report?
- g. What participant data does the agency collect and how is it used?
 - Does the agency track if participants use multiple services? ☐ Yes ☐ No

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- Can the agency pull reports on how many participants each individual program served during a specific period? (*Org. Standard 9.1*) ☐ Yes ☐ No
- h. Does the agency have a system in place to track family, agency, and/or community outcomes? (*Org. Standard 9.2*) ☐ Yes ☐ No
- i. Does the agency track and compare data from multiple years to see trends in agency success, customer satisfaction, or other areas? ☐ Yes ☐ No
- j. In the past 12 months, has the agency presented to the governing board for review and action, an analysis of its outcomes and any operational or strategic program adjustments and improvements identified as necessary? (*Org. Standard 9.3*) ☐ Yes ☐ No
- k. What performance reports does the agency routinely generate?
 - To whom are they provided?
 - How frequently?
- l. What staff are responsible for ensuring accurate and complete collection of CSBG Annual Report data?
- m. Is there any training or technical assistance related to ROMA and program evaluation that would be useful to your agency?
- n. Describe the process of completing the agency's most recent Community Needs Assessment. (*Org. Standard 3.1*)
- o. Does the agency's most recent Community Needs Assessment include: (*Org. Standards 1.2, 2.2, 3.2*)
 - ☐ External data (such as Census data) specific to poverty and its prevalence related to gender, age, and race/ethnicity in the agency's service area?
 - ☐ Input from low-income community members?
 - ☐ Input from the agency's community partners, stakeholders, and other service providers?
- p. Did the most recent Community Needs Assessment include qualitative and quantitative data on your service area? (*Org. Standard 3.3*) ☐ Yes ☐ No
- q. Was the board involved in the process of designing and reviewing the Community Needs Assessment? ☐ Yes ☐ No
 - Did the board formally accept the completed Community Needs Assessment? (*Org. Standard 3.5*) ☐ Yes ☐ No

- r. **Does the Community Needs Assessment include key findings on the causes and conditions of poverty and the needs of the communities that were assessed?** (*Org. Standard 3.4*)
☐ Yes ☐ No
- s. **What are some examples of programmatic changes made as a result of Community Needs Assessments in recent years?**
- t. **Was a Community Action Plan (part of the CSBG application) developed from the Community Needs Assessment?** ☐ Yes ☐ No
- **If yes, was the Community Action Plan outcome-based, anti-poverty focused, and tied directly to the Community Needs Assessment?** (*Org. Standard 4.2*) ☐ Yes ☐ No
- u. **Does the board receive an annual update on the success of specific strategies included in the Community Action Plan?** (*Org. Standard 4.4*) ☐ Yes ☐ No
- v. **Does the agency have a current strategic plan?** ☐ Yes ☐ No
- **If yes, when and how was it developed?**
 - **How does the agency assess progress on the strategic plan and report this progress to staff and the board?** (*Org Standards 6.1 and 6.5*)
 - **How does the agency include customer input/data from low-income collected during the Community Needs Assessment in the strategic planning process?** (*Org. Standard 6.4*)
 - **Do the agency's Community Action Plan and Strategic Plan document the continuous use of the full ROMA cycle (assessment, planning, implementation, achievement of results, and evaluation)?** ☐ Yes ☐ No
 - **Does the agency use the services of a ROMA-certified trainer to assist in implementation?** (*Org. Standard 4.3*) ☐ Yes ☐ No

10. Management Interview with the Executive Director and Appropriate Program Management Staff

Interview Attendees	
Program Manager(s)	
Executive Director	
Others from Agency	
DCF Representative(s)	

- a. **Beyond board membership, how does the agency include low-income people in its activities?**
(Org. Standard 1.1)

- b. **Does the agency have a system in place to gather customer service satisfaction feedback from program participants?** ☐ Yes ☐ No
 If yes, describe the system:
 - **Is the feedback shared with the board of directors?** (Org. Standard 1.3) ☐ Yes ☐ No

- c. **How does the agency communicate its activities and results to the public?** (Org. Standard 2.3)

- d. **How does the agency ensure that programs don't discriminate on the basis of race, color, national origin, sex, age, religion, or disability as required by the CSBG Act nor do they ban non-citizens solely on the basis of their immigration status unless such exclusion is authorized by another statute?** (OCS IM 30)

- e. **Are all agency facilities accessible to persons with disabilities?** ☐ Yes ☐ No
- f. **What steps has the agency taken to address language barriers that exist for low-income communities in its service area?**

- g. Describe what policies and procedures the agency has in place to ensure privacy and confidentiality of participant information.
- h. In the past three years, has the agency received a monitoring visit or review of an agency program funded by another federal or state grant/contract? ☐ Yes ☐ No
Were any findings or corrective action plans generated as a result? ☐ Yes ☐ No
- If yes, describe:
- i. Do all CSBG funded programs have participant eligibility criteria in compliance with federal regulations? ☐ Yes ☐ No
- Is there an agency-wide policy and procedure for income qualification (125% of federal poverty guideline) for participants of CSBG supported programs? ☐ Yes ☐ No
- j. How does the agency refer single custodial parents to the local child support agency? (*CSBG Act*)
- k. Does the agency require drug testing for any programs? ☐ Yes ☐ No
- If yes, do 100% of people who test positive receive appropriate AODA referrals? (*CSBG Act*) ☐ Yes ☐ No
- l. Does the agency have a record retention policy for participant files? ☐ Yes ☐ No
- m. What are the most significant sources of referrals to the agency's programs?
- n. What agencies are primary or vital partners in identifying and serving agency participants?
- How does the agency work with its partners for specifically identified purposes? (*Org. Standard 2.1*)
 - Do these partners include other anti-poverty organizations in the area? (*Org. Standard 2.1*)
☐ Yes ☐ No
- o. What community supports are important to agency success and how do they contribute to that success? (Be specific: business, religious organizations, academic institutions, etc.)

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- p. **Within the agency's community (or service area), does the agency participate in any networks, councils or other groups that foster communication and collaboration on policy, practice, or service delivery?**
- q. **What linkages exist between governmental and social services in your agency's service area?**
- **What is the agency's role in those connections?**
- r. **What is the agency's referral, coordination of services, and collaborative relationship with the providers of the following services in its area?**
- **Wisconsin Works**
 - **Emergency Assistance**
 - **Job Access Loans**
 - **Refugee services**
 - **Head Start**

11. Participant File Reviews for CSBG and CSBG CARES-funded Programs

Summary of findings across all reviewed programs to be addressed after all participant files have been reviewed and the case file review worksheets completed. The contract manager should copy the worksheet (following) to accommodate the number of participant files that are reviewed.

Programs Reviewed					
Program Name	Program Description	Program Manager	Questions?	Aligns with CSBG Act Fundable Activities?	# of Files Reviewed
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
Skills Enhancement Program				<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Summary of Results		
Criteria	Met?	Comments
Do the reviewed files indicate that all participants provided services with CSBG funds (and/or SEP funds, as applicable) were eligible (125%/150% FPL)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Is there evidence of adequate tools and standardized procedures for determining and documenting participant eligibility?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Is documentation such as a bill, voucher, and/or copy of the check retained in files for direct financial assistance provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Were case management activities thoroughly documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Were participants' goals mutually-agreed to and documented?	<input type="checkbox"/> Yes	

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	<input type="checkbox"/> No <input type="checkbox"/> Varied	
Were efforts to achieve goals documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Were goals oriented toward self-sufficiency?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Is there evidence that participants were referred to other programs for needs beyond the program's scope?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Is the agency taking appropriate steps to ensure privacy and confidentiality of participant information, such as secure files, confidentiality policies, private consultation space, etc.?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Is there evidence that single custodial parents received child support agency referrals?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Does the agency ensure ongoing eligibility for each program in accordance with program requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	
Did the review of the documentation indicate that the services have helped participants become more self-sufficient?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Varied	

Notes:

Participant Case File Review Worksheet

Program Name	File #
Date of intake:	
Date of exit (or currently enrolled):	
Services received:	
Description and amount of financial assistance, if applicable:	
Is a copy of the bill, voucher and/or check retained in the file?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that the participant meets CSBG income eligibility guidelines?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, what documentation was used to determine the participant's eligibility?	
If applicable, was ongoing eligibility documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the participant a single custodial parent?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is there evidence the participant was referred to the local child support agency?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are other referrals documented in file?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the participant receive case management services?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, how are case management services documented?	
Are goals and progress towards these goals clearly documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Notes:	

Participant Case File Review Worksheet

Program Name	File #
Date of intake:	
Date of exit (or currently enrolled):	
Services received:	
Description and amount of financial assistance, if applicable:	
Is a copy of the bill, voucher and/or check retained in the file?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that the participant meets CSBG income eligibility guidelines?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, what documentation was used to determine the participant's eligibility?	
If applicable, was ongoing eligibility documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the participant a single custodial parent?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is there evidence the participant was referred to the local child support agency?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are other referrals documented in file?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the participant receive case management services?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, how are case management services documented?	
Are goals and progress towards these goals clearly documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Notes:	

12. Exit Interview Preparations and Visit Wrap-Up

Follow-up items for DCF:

Follow-up items for agency:

Strengths:

Recommendations/areas of concern:

Will exit interview be conducted at a later date telephonically? ☐ Yes ☐ No

If yes, what items (if not already noted above) are needed prior to that interview?

Once visit follow-up is completed, the contract manager will schedule the exit interview (if not completed while onsite), and issue a final monitoring report to the agency within thirty (30) days of the exit interview date (completion of monitoring).

13. Exit Interview

The contract manager will go over preliminary findings with the executive director, board chair or other officer, and any other leaders the agency wishes to have present. The contract manager will share overall impressions of the agency's strengths along with any areas of concern and any areas where the contract manager has questions or needs more information.

Interview Attendees	
Executive Director	
Others from Agency	
DCF Representative(s)	
Date exit interview conducted:	

Notes:

CSBG Organizational Standards Post-Monitoring Assessment

Contract manager to complete this assessment after completing the monitoring visit. Any unmet Organizational Standards will be noted on the final monitoring report submitted to the agency for review and correction.

Category 1: Consumer Input and Involvement	Location in Monitoring Tool	Is the Standard met?
1.1) The organization demonstrates low-income participation in its activities.	Section 10	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.2) The organization analyzes information collected directly from low-income individuals as part of its triennial community needs assessment.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.3) The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.	Section 10	<input type="checkbox"/> Yes <input type="checkbox"/> No
Category 2: Community Engagement	Location in Monitoring Tool	Is the Standard met?
2.1) The organization has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.	Section 10	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.2) The organization utilizes information gathered from key sectors of the community in assessing needs and resources. This would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.3) The organization communicates its activities and its results to the community.	Section 10	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.4) The organization documents the number of volunteers and hours mobilized in support of its activities.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
Category 3: Community Assessment	Location in Monitoring Tool	Is the Standard met?
3.1) The organization conducted a community needs assessment and issued a report within the past 3 years.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.2) As part of the community assessment, the organization collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3) The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.4) The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.5) The governing board formally accepts the completed community assessment.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No

ATTACHMENT 3: CSBG Monitoring Tool

Category 4: Organizational Leadership	Location in Monitoring Tool	Is the Standard met?
4.1) The governing board has reviewed the organization's mission statement within the past 5 years and assured that: 1) the mission addresses poverty; and 2) all programs and services are in alignment with the mission.	Section 3	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.2) The organization's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.3) The organization's Community Action plan and strategic plan document the continuous use of the full ROMA cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the organization documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4) The governing board receives an annual update on the success of specific strategies included in the Community Action plan.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.5) The organization has a written succession plan in place for the CEO/ED, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.6) An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.	Section 7	<input type="checkbox"/> Yes <input type="checkbox"/> No
Category 5: Board Governance	Location in Monitoring Tool	Is the Standard met?
5.1) The organization's governing board is structured in compliance with the CSBG Act: 1) At least one-third democratically-selected representatives of the low-income community; 2) With one-third local elected officials (or their representatives); and 3) The remaining membership from major groups and interests in the community.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.2) The organization's governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.	Pre-monitoring desk review; Section 3	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.3) The organization's bylaws have been reviewed by an attorney within the past 5 years.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.4) The organization documents that each governing board member has received a copy of the bylaws within the past 2 years.	Section 2	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.5) The organization's governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.6) Each governing board member has signed a conflict of interest policy within the past 2 years.	Pre-monitoring desk review; Section 2; Board Survey	<input type="checkbox"/> Yes <input type="checkbox"/> No

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5.7) The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.	Section 3; Board Survey	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.8) Governing board members have been provided with training on their duties and responsibilities within the past two years.	Section 3	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.9) The organization's governing board receives programmatic reports at each regular board meeting.	Section 3; Board Survey	<input type="checkbox"/> Yes <input type="checkbox"/> No
Category 6: Strategic Planning	Location in Monitoring Tool	Is the Standard met?
6.1) The organization has an agency-wide strategic plan in place that has been approved by the governing board within the past 5 years.	Pre-monitoring desk review; Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.2) The approved strategic plan addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.3) The approved strategic plan contains family, agency, and/or community goals.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.4) Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.5) The governing board has received an update(s) on progress towards meeting the goals of the strategic plan within the past 12 months.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
Category 7: Human Resource Management	Location in Monitoring Tool	Is the Standard met?
7.1) The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.2) The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.	Section 5	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.3) The organization has written job descriptions for all positions, which have been updated within the past 5 years.	Section 4	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.4) The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.	Section 3	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.5) The governing board reviews and approves CEO/executive director compensation within every calendar year.	Section 3	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.6) The organization has a policy in place for regular written evaluation of employees by their supervisors.	Section 4	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.7) The organization has a whistleblower policy that has been approved by the governing board.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No

ATTACHMENT 3: CSBG Monitoring Tool

7.8) All staff participate in a new employee orientation within 60 days of hire.	Section 5	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.9) The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
Category 8: Financial Operations and Oversight	Location in Monitoring Tool	Is the Standard met?
8.1) The organization's annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.	Contract Compliance Checklist	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.2) All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.	Contract Compliance Checklist	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.3) The organization's auditor presents the audit to the governing board.	Section 7	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.4) The governing board formally receives and accepts the audit.	Section 7	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.5) The organization has solicited bids for its audit within the past 5 years.	Section 7	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.6) The IRS Form 990 is completed annually and made available to the governing board for review.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.7) The governing board receives financial reports at each regular meeting that include the following: <ul style="list-style-type: none"> • Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and • Balance sheet/statement of financial position. 	Section 3	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.8) All required filings and payments related to payroll withholdings are completed on time.	Section 7	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.9) The governing board annually approves an organization-wide budget.	Section 3	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.10) The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.11) A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.12) The organization documents how it allocates shared costs through an indirect cost rate, or through a written cost allocation plan.	Pre-monitoring desk review	<input type="checkbox"/> Yes <input type="checkbox"/> No

ATTACHMENT 3: CSBG Monitoring Tool

8.13) The organization has a written policy in place for record retention and destruction.	Section 7	<input type="checkbox"/> Yes <input type="checkbox"/> No
Category 9: Data and Analysis	Location in Monitoring Tool	Is this Standard met?
9.1) The organization has a system or systems in place to track and report services customers receive.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.2) The organization has a system or systems in place to track family, agency, and/or community outcomes.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.3) The organization has presented to the governing board for review and action, at least within the 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.	Section 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.4) The organization submits its CSBG Annual Report data on time and it reflects client demographics and organization-wide outcomes.	Contract Compliance Checklist	<input type="checkbox"/> Yes <input type="checkbox"/> No



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Governor Tony Evers
 Secretary Emilie Amundson

Division of Family and Economic Security
 Bureau of Working Families

DATE:

TO: Name of Executive Director, Title
 Agency Name

CC: Name of CSBG Contact (if different), Title

FROM: Anna Sainsbury, Contract Manager

RE: Request for Materials for CSBG Monitoring Review

In preparation for the Community Services Block Grant (CSBG) onsite monitoring review scheduled at your agency for Date(s) of visit, I would like to review materials in advance in order to have a focused, efficient onsite review.

Please complete and return the attached *CSBG Funded Programs Form* and *Board Roster Form* by Date approx. 1 week from memo date so I may send the Board CSBG Monitoring Survey to Agency Name's board members.

Please also forward the following materials to me by Date approx. 1 week prior to site visit:

- ☐ Agency Name's bylaws, along with date of last review by the board and when they were last reviewed by an attorney, if applicable;
- ☐ Schedule of board meetings and committee meetings for 20--(year);
- ☐ Board orientation manual and other board member on-boarding materials, including Agency Name's conflict of interest policy;
- ☐ Organization chart;
- ☐ Personnel policies and procedures manual and the date of last review by an attorney and approval by the board;
- ☐ Succession plan;
- ☐ Copies of Agency Name's general ledger and bank reconciliations for:
 Month and Year
 Month and Year;
- ☐ Fiscal policies and procedures manual;
- ☐ List of entities with which Agency Name subcontracts CSBG funds and the amount and purpose of each contract, if applicable;
- ☐ Strategic plan;
- ☐ List of other federal programs under which the agency provides services (i.e., Head Start, HUD programs, YouthBuild); and
- ☐ List of staff members (including title and role) with CSBG funded positions (any amount) and the percentage of time that was allocated to CSBG in the past 12 months.

Please email these materials to me at anna.sainsbury@wisconsin.gov. If any of these materials cannot be easily sent electronically, let me know and I will plan time to review them during my onsite visit.

Thank you in advance for your cooperation with this process. I look forward to meeting with you and your team in person soon. In the meantime, please let me know if you have any questions.

Board Roster and Open Seats Form

[illegible]

CSBG Agency Board Member Survey

Personal information you provide may be used for secondary purposes [Privacy Law, s. 15.04(1)(m), Wisconsin Statutes].

This survey is part of the Wisconsin Department of Children and Families' (DCF) monitoring process for organizations that receive Community Services Block Grant (CSBG) funds. DCF is required by federal law to monitor each agency once every three years. Please take a few moments to complete this survey.

Your answers will be used to help identify any technical assistance needs the agency may have. Please contact your CSBG Contract Manager with any questions at DCF.CSBG@wisconsin.gov or (608) 422-6270. Thank you for your time and for your service to your community.

Agency Name	Date Submitted / /
Your Name	Your Board Title (if applicable)

1. **How long have you been a board member?**
 - ☐ Less than 1 year
 - ☐ 1 to 4 years
 - ☐ 5 to 9 years
 - ☐ 10 years or longer
2. **What sector do you represent on the board?**
 - ☐ Public Official/Appointed Official
 - ☐ Low-Income Representative
 - ☐ Private (Citizen, Community Member, Representative of a private organization or group)
 - ☐ I'm not sure
3. **If you represent low-income individuals and families, were you elected by low-income members of the community?**
 - ☐ Yes
 - ☐ No
 - ☐ I'm not sure
4. **If you represent a public official or specific group or organization do you provide regular reports about the board meetings to the person or group you represent?**
 - ☐ Yes
 - ☐ No
 - ☐ This does not apply to me
5. **Please check the following agency documents to which you have access and/or you have reviewed:**
 - ☐ Bylaws
 - ☐ Board Manual/Board Policies and Procedures
 - ☐ Personnel Policies and Procedures
 - ☐ Fiscal Manual
 - ☐ Strategic Plan

6. How often are board meetings held?

7. Who chairs your board meetings?

8. Are you a member of any board committees?

☐ Yes

☐ No

If yes, which committee?

How frequently does this committee meet?

☐ Monthly

☐ Quarterly

☐ As needed

☐ Other (please specify)

Are minutes kept for your committee's meetings?

☐ Yes

☐ No

9. Does the board perform a periodic performance review or evaluation of the executive director?

☐ Yes

☐ No

If yes, did you participate in the most recent performance review?

☐ Yes

☐ No

10. Did you have a role in the development and/or review of the agency's most recent community needs assessment?

☐ Yes

☐ No

If yes, please describe your role:

11. Did you review the agency's most recent annual CSBG application?

☐ Yes

☐ No

12. Did you have a role in developing the work plan and program goals that are outlined in the CSBG application?

☐ Yes

☐ No

If yes, please describe your role:

13. Does every board meeting include updates on the agency's programs?

☐ Yes

☐ No

14. Does every board meeting include an update on the agency's financial status?

☐ Yes

☐ No

15. Have you signed a Conflict of Interest statement within the past two years?

☐ Yes

☐ No

16. Did you receive an orientation within your first six months as a new board member?

☐ Yes

☐ No

If yes, from whom?

17. Have you participated in the review of the following?

☐ Cost allocation plan

☐ Indirect cost proposal (if your agency has one)

☐ IRS Form 990

☐ Annual audit

☐ Travel policy

☐ Executive director's contract/compensation package

☐ Annual agency budget

18. Have you received training to understand financial reports and the audit?

☐ Yes

☐ No

If yes, who provided the training?

☐ CFO/finance director

☐ Executive director

☐ Finance or audit committee

☐ Other (please specify)

19. Who is responsible for signing agency checks?

20. Who approves the executive director's expenses?

21. Are there any legal actions pending against the agency?

☐ Yes

☐ No

☐ I don't know

If yes, please explain:

22. Does the board review and approve all substantial agency transactions, such as the agency borrowing money or purchasing property?

☐ Yes

☐ No

☐ I don't know

23. Have you received training on the following within the past 2 years?

Parliamentary procedures ☐ Yes ☐ No ☐ I would like to receive this training

Board governance/responsibilities ☐ Yes ☐ No ☐ I would like to receive this training

Internal control procedures ☐ Yes ☐ No ☐ I would like to receive this training

Fiduciary responsibilities ☐ Yes ☐ No ☐ I would like to receive this training

Community action history ☐ Yes ☐ No ☐ I would like to receive this training

CSBG rules and regulations ☐ Yes ☐ No ☐ I would like to receive this training

ROMA ☐ Yes ☐ No ☐ I would like to receive this training

(Results Oriented Management and Accountability)

24. Comments or Questions: